

2002 - Oahu - FEIS -
Waimanalo Gulch Landfill J

JAN 23 2003
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APPENDIX J - WAIMANALO GULCH SANITARY LANDFILL EXPANSION
COMMENTS AND RESPONSES TO THE
SEIS PREP NOTICE AND DRAFT SEIS
CITY AND COUNTY OF HONOLULU, OAHU, HAWAII

DECEMBER 2002

Department of Planning
City and County of Honolulu

JAN 16 PM 1:17

RECEIVED

Prepared for:

Department of Environmental Services (ENV)
City and County of Honolulu
1000 Uluohia Street, 3rd Floor
Kapolei, Hawaii 96707

APPENDIX J

Comments and Responses to the
Supplemental Environmental Impact Statement
(SEIS) Preparation Notice (PN)

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 527-5553 • Fax: (808) 527-6475



JEREMY HARRIS
MAYOR

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR
BARRY FUKUMAGA
DEPUTY DIRECTOR
IN REPLY REFER TO:
RE 00-0023

March 6, 2000

MEMORANDUM

TO: RANDALL K. FUJIKI, DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

ATTENTION: GORDON WOOD, PLANNING DIVISION

FROM: KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL SERVICES

SUBJECT: DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT
STATEMENT (SEIS) PREPARATION NOTICE FOR THE
EXPANSION OF THE WAIMANALO GULCH SANITARY LANDFILL

Thank you for your comments, dated February 8, 2000, regarding the subject Draft SEIS Preparation Notice for the expansion of the Waimanalo Gulch Sanitary Landfill. The following response numbered to correspond to your comments will be included in the Draft SEIS:

1. Comment noted.
2. We will revise the section discussing the adoption of the Ewa Development Plan (DP) and the proposed project's compliance with the DP's illustrative maps, policies and principals.
3. The selected figures will be revised to scale as noted.
4. The original contract between the City and Waste Management of Hawaii, Inc., has been amended to include the management of the proposed expansion of the existing landfill facility.
5. Additional documentation supporting conclusions stated in the Preparation Notice will be provided. The Draft SEIS will provide a more comprehensive analysis with data to support conclusions.

Randall K. Fujiki
March 6, 2000
page 2

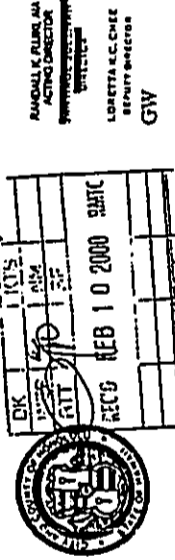
6. We acknowledge your concern regarding the proposed landfill expansion, capacity and lifespan. Further discussion of these items will be provided in the forthcoming Draft SEIS.
7. The proposed project will utilize a variety of mitigation measures, including earth stockpiles near the working face, fire breaks and off-highway water pull. We acknowledge your concern and will discuss potential fire related impacts and mitigation measures for the proposed project.
8. The proposed landfill expansion will be required regardless of current efforts to reduce Oahu's waste stream. The existing landfill capacity is becoming exhausted by non-recyclable and non-reclaimable municipal solid waste (MSW) and H-POWER ash. Current City efforts with resource recovery, recycling, and bioconversion, however, remain important and will continue to be investigated and implemented, as practically allows. Although these alternatives will extend the useful life of the proposed landfill, it is not cost-effective to reclaim some materials since recycling markets are unstable. However, as appropriate, we will include a discussion of potential measures that might be considered as the proposed landfill expansion capacity becomes exhausted.
9. Additional information will be provided concerning actions associated with the eventual closure of the landfill.

Should you have questions or require additional information, please do not hesitate to contact Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (ext. 22).

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

630 SOUTH KING STREET • HONOLULU, HAWAII 96813
PHONE 808-521-3233 • FAX 808-521-8743



February 8, 2000

R.M. Towill Corporation
Attn: Brian Takeda
420 Waiakamilo Road, Suite 411
Honolulu, Hawaii 96817-4941

Dear Mr. Takeda:

**DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT PREPARATION
NOTICE FOR THE EXPANSION OF THE WAIMANALO GULCH SANITARY LANDFILL**

We have reviewed the above-referenced document and offer the following comments:

1. While the proposed actions appear generally consistent with provisions of the General Plan, the Ewa Development Plan, and applicable zoning regulations, we will reserve comment until we have had an opportunity to review the forthcoming Draft SEIS.
2. Some statements regarding the Ewa Development Plan should be revised. This plan was adopted in August 1997, and became effective in October 1997. The plan does not designate this site Agricultural; instead, the plan's illustrative Open Space and Phasing maps depict the site as within the Preservation area. The SEIS should also clarify that the plan's illustrative Public Facilities map depicts a symbol for the existing landfill but does not delineate the boundaries of the existing landfill.
3. Consistent with the guidelines set forth in OEQC's Environmental Guidebook, the maps provided in the SEIS should be prepared to scale.
4. We note the intent of the proposed actions is to extend the useful life of this facility to 2017. Section 3.13 states that the facility will be operated by Waste Management Hawaii, Inc (WMHI). The SEIS should clarify whether current contractual agreements between the City and WMHI extend to 2017.
5. The SEIS should provide supporting data for the conclusions stated therein. For example, Section 3.15 states that the number of people entering the work force has fallen due to "baby boomers having fewer children" but provides no data to support this assertion.

Mr. Brian Takeda
R.M. Towill Corporation
Page 2
February 8, 2000

6. The calculation that expanding the landfill will allow it to stay open until 2017 should be revisited. The State Department of Business, Economic Development and Tourism has issued draft population and economic projections to 2025. These new projections indicate Oahu's population growth will be about half that originally projected through 2020, and economic growth will be about one-third less than previously projected for the same period. Thus, it is possible that the proposed expansion in capacity may suffice beyond the 2017 frontier.

7. A discussion of fire hazards is typically included in an EIS, and should be included in this SEIS. It should be made clear, for example, that the high-voltage power lines above the valley are high enough that it is unlikely they would suffer damage from a landfill fire. A statement on the need to provide a fire buffer zone around each active working area should also be included.

8. Chapter 5 addresses alternatives to the proposed actions. Much of the argument against the presented alternatives has to do with their inability to provide timely response to Oahu's current need for additional solid waste disposal capacity to provide "the time desperately needed for the phasing of resource recovery, recycling, bioconversion, and other programs." The SEIS should clarify whether the proposed actions will provide the needed time and, if not, what measures are anticipated to be necessary when the additional capacity provided by the current proposals is exhausted.

9. The SEIS should address what, if any, plans have been developed with regard to eventual closure of the landfill and anticipated use(s) of the site after its capacity is exhausted.

Thank you for the opportunity to review this preparation notice. Should you have any questions or concerns regarding these comments, please contact Gordon Wood of my staff at 527-6073.

Sincerely yours,

RANDALL K. FUJIKI, A.I.A.
Acting Director of Planning and Permitting

RKF:lh

cc: Kenneth E. Sprague, Director, Department of Environmental Services

0113r.gw



JEREMY HARRIS
MAYOR

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR

BARRY FUKUNAGA
DEPUTY DIRECTOR

WE REFER TO:
RE 00-024

March 7, 2000

Mr. Gary Gill, Deputy Director
Environmental Health Services Division
Department of Health
State of Hawaii
P.O. Box 3378
Honolulu, Hawaii 96801

Dear Mr. Gill:

Subject: Draft Supplemental Environmental Impact Statement (SEIS) Preparation
Notice for the Expansion of the Waimanalo Gulch Sanitary Landfill

Thank you for your comments, dated February 4, 2000, regarding the subject Draft SEIS Preparation Notice for the expansion of the Waimanalo Gulch Sanitary Landfill. The following response to your comments will be included in the Draft SEIS:

Litter and Dust

Due to active coordination with the residents and businesses in the surrounding community, there have been only two complaints received since 1989, the inception of the landfill. These complaints were filed by passing motorists at the State Department of Health regarding litter control. The use of portable and permanent fences will continue to be installed at the working face of the site in relation to the prevailing winds to confine windblown litter. Maintenance personnel will also remain on standby at all times, in case of high winds, for litter collection off-site.

The final grades for the landfill expansion are below the ridge line so the landfill operations will remain below the ridge lines. The ridge lines will continue to be a natural barrier for dust and litter.

Dust generated from H-POWER ash will also be further addressed with appropriate discussion concerning potential for adverse impacts and proposed mitigation measures.

Traffic

We note your comments concerning traffic and will coordinate this item with the State Department of Transportation.

Visual Impacts

The proposed landfill expansion will involve the continuation of an existing land use. The region surrounding the landfill already contains a diverse mixture of land uses including the Hawaiian Electric Kahe Power Plant immediately to the north, Kahe Point Beach Park to the west, the Ko Olina Resort approximately one to two miles southeast, the Barbers Point Deep Draft

Mr. Gary Gill
March 7, 2000
Page 2

Harbor two to three miles south, and the Industrial facilities of the Campbell Industrial Park approximately four to five miles south and slightly to the west. The Honokai Hale subdivision is located approximately one mile southeast and the Nanakuili subdivision approximately one and a half miles north.

We acknowledge the need to minimize the potential for visual impacts associated with landfill operations. As much as practicable, mitigation measures, including use of berms, construction sequencing and placement of roads, will be employed.

Other

There is no "wash-down area" within the landfill, including the "lower service area." All vehicles permitted to the active cell sites are required to transfer all material at the site. There is also no "washing down" of transfer vehicles within the sanitary landfill facility. Excess water within the landfill can result in the development of leachate. Therefore, the use of water is strictly regulated to control dust on roadways and within the active cell sites.

Clean Air Branch (CAB)

We acknowledge the proposed landfill expansion will be subject to the Federal New Source Performance Standard, 40 CFR 60 Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills, and will coordinate with the Clean Air Branch to fulfill all guidelines and requirements.

Control of Fugitive Dust

Dust and litter will be controlled by use of standard water tanker trucks or sprinkler systems extended from the existing landfill to the expansion area. During operation of the proposed expansion area, dust will continue to be generated from landfilling activities. The proposed expansion will adhere to dust control practices according to Air Pollution Control Regulations Title 11 (Chapter 60) of the State Department of Health, which includes scheduled water sprinkling, compacting, and intermediate cover. Portable and permanent litter fences will also be installed at the working face of the site in relation to the prevailing winds to confine windblown litter. In the event of high winds, maintenance personnel will be on standby for litter collection off-site.

We acknowledge the importance of controlling and minimizing fugitive dust. Fugitive dust management and mitigation measures will be addressed in the Draft SEIS document.

Should you have questions or require additional information, please do not hesitate to contact Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (ext. 22).

Sincerely,

KENNETH E. SPRAGUE
Director

cc: Mr. Joe Hernandez - Waste Management of Hawaii, Inc.
Mr. Brian Takeda - R.M. Towill Corporation

The visual impact of landfill operations should be minimized by keeping appurtenant facilities out of the visual plane. Methods that may be employed include: the use of berms, the sequencing of active landfill workface activities, and keeping all haul and service roads on the perimeter of the property.

Other

The current wash-down area is at the lower service area of the landfill and a relocation may be needed to reduce the potential for odor generation related to truck wash-downs.

Please contact Mr. Lane Otsu of the Office of Solid Waste Management at 586-4240 with any questions regarding these comments.

Clean Air Branch (CAB)

Proposed Expansion and Permit Applicability:

As a result of the proposed expansion, the Waimanalo Gulch Landfill is required to obtain a covered source air permit. The landfill will be subject to Federal New Source Performance Standard, 40 CFR 60 Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills. If you have any questions, please contact the Engineering Section of the Clean Air Branch at 586-4200.

Control Of Fugitive Dust:

There is a significant potential for fugitive dust emissions to be generated during all phases of landfill operations due to the typically arid climatic conditions and regional topography that exists in that part of the island. It is suggested that a dust control management plan be developed which identifies and addresses activities having a potential to generate fugitive dust. Implementation of adequate dust control measures during all phases of landfill operations are warranted. Landfill activities must comply with provisions of Chapter 11-60.1, "Air Pollution Control," Hawaii Administrative Rules, section 11-60.1-33 on Fugitive Dust.

The operation should provide adequate means to control dust from road areas and during the various phases of landfill activities, including but not limited to:

- a. focusing on minimizing the amount of dust-generating materials and activities, centralizing material transfer points and on-site vehicular traffic routes, and locating potentially dusty equipment in areas of the least impact;

- b. providing an adequate water source at site prior to start-up of construction activities;
- c. landscaping and rapid covering of bare areas, including slopes, starting from the initial grading phase;
- d. controlling of dust from shoulders, project entrances, and access roads; and
- e. providing adequate dust control measures during landfill activities, after hours, and prior to daily start-up.

If you have any questions regarding fugitive dust, please contact Mr. Timothy Carvalho of the Clean Air Branch at 586-4200.

Sincerely,


GARY GILL
Deputy Director for
Environmental Health

c: OSWM
CAB



Mr. Brian Takeda
February 4, 2000
Page 2

STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. BOX 3378
HONOLULU, HAWAII 96801

February 4, 2000

93-049A/epo

Litter and Dust

Current landfill operations include both a litter and dust control program. However, both programs should be enhanced in conjunction with the landfill's expansion due to the nearby resort and residential developments.

At present, landfill operations take place below the ridge lines of the Waimanalo Gulch. The ridge lines act to contain dust and litter generated by landfill operations. It should be noted that the proposed landfill expansion will take place both horizontally and vertically. The proposed vertical expansion will eventually lead to landfill operations that rise over the existing ridge lines. The elimination of the ridge lines as a natural barrier for dust and litter, in addition to increasing refuse tonnages being deposited in the landfill, will result in greater quantities of dust and wind blown litter exiting the landfill area.

Dust control is also an issue in regards to the disposal of H-Power ash. The ash material contains heavy metals, dioxin, and furans. For these reasons, the Department feels that a more extensive litter and dust control program is essential to keep these nuisances to a minimum and should be addressed in the Draft Environmental Impact Statement (DEIS).

Traffic

While the issue of traffic is addressed in the Supplemental EIS, we feel that all potential problems were not adequately discussed. As the major solid waste facility serving the island of Oahu, truck traffic can be significant. Increasing solid waste generation has already resulted in truck queues that exceed the facility's entrance road and spill out onto the highway area. This increases the potential for litter, odor and traffic problems.

Additionally, it should be noted that the H-Power facility is shut down annually for maintenance and repairs. During this scheduled one month closure, and all other unscheduled closures, all H-Power waste traffic is diverted to the Waimanalo Gulch Landfill. During these times, daily tonnage at the landfill increases to approximately 3,000 tons of waste per day. During these periods of increased traffic, it is not unusual for refuse trucks to be backed-up onto Farrington Highway. Expansion plans should include provisions to reduce or eliminate these traffic problems.

Visual Impacts

Because of the nature of nearby areas, which include residential as well as resort areas, the visual impact of the landfill is an important factor to be addressed.

BRUCE S. ANDERSON, Ph.D., M.P.H.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. BOX 3378
HONOLULU, HAWAII 96801

February 4, 2000

93-049A/epo

Mr. Brian Takeda
R. M. Towill Corporation
420 Waiakamilo Road, Suite 411
Honolulu, Hawaii 96817-1133

Dear Mr. Takeda:

Subject: Supplemental Environmental Impact Statement Preparation Notice (SEISPN)
Expansion of the Waimanalo Gulch Sanitary Landfill
Kahie, Oahu
TMK: 9-2-03: 72 & 73

Thank you for allowing us to review and comment on the subject project. We have the following comments to offer:

The City and County of Honolulu, Department of Environmental Services proposes to expand by 60.5 acres the existing Waimanalo Gulch Sanitary Landfill in Kahie Valley, Oahu. This expansion would address the solid waste and ash related disposal needs to the year 2017.

Solid Waste

The Waimanalo Gulch Sanitary Landfill is the only municipal solid waste landfill serving the island of Oahu. It accepts both municipal solid waste and the ash residue from the H-Power facility. Municipal solid waste is accepted at a rate of about 1000 tons per day and ash at a rate of approximately 400 tons per day. The site is located off Farrington Highway and adjacent to a major resort and residential developments.

The expansion of the Waimanalo Gulch Sanitary Landfill is subject to regulation by the Department's Office of Solid Waste Management. As such, all technical aspects of the landfill's expansion will be addressed through the solid waste permitting process. However, there are several issues the Department feels should be addressed through the Environmental Impact Statement process. These issues include those of litter, odor, dust, traffic and visual impacts.

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 527-4413 • Fax: (808) 527-6976



KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR
BARRY FUCHSAGA
DEPUTY DIRECTOR
IN REPLY REFER TO:
RE 00-078

March 2, 2000

REPLY HARRIS
MAYOR

Mr. Brian K. Minaai
Deputy Director
Department of Transportation
State of Hawaii
869 Punchbowl Street
Honolulu, Hawaii 96813-5097

Dear Mr. Minaai:

Subject: Draft Supplemental Environmental Impact Statement (SEIS) Preparation
Notice for the Expansion of the Waimanalo Gulch Sanitary Landfill

Thank you for your comments, dated January 18, 2000, regarding the subject Draft SEIS Preparation Notice for the expansion of the Waimanalo Gulch Sanitary Landfill. We acknowledge your comment that the Department of Transportation does not anticipate significant impacts to State highway facilities. As requested, we are enclosing a copy of the traffic study by Julian Ng for your review.

Should you have questions or require additional information, please do not hesitate to contact Joseph Hernandez of Waste Management of Hawaii, Inc., at 688-2985 (ext. 22).

Sincerely,

[Signature]
KENNETH E. SPRAGUE
Director

Enclosure

cc: Mr. Joe Hernandez - Waste Management of Hawaii, Inc.
Mr. Brian Takeda - R.M. Towill Corporation

KAZUHIYAGAKI
DIRECTOR
COUNTY DIRECTORS
BRIAN K. MINAAI
GLENN H. OKAMOTO

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

JAN 18 2000

R. M. Towill Corporation
420 Waiakamilo Road, suite 411
Honolulu, Hawaii 96817-4941

Attention: Mr. Brian Takeda

Dear Sir:

Subject: Draft Supplemental Environmental Impact Statement Preparation Notice
Expansion of Waimanalo Gulch Sanitary Landfill, TRK: 9-2-03: 072, 073

Thank you for the opportunity to provide comments for the preparation of the supplemental EIS.

Since the expansion of the sanitary landfill is to provide continued landfill capacity, we do not anticipate that the expansion would significantly impact our State highway facilities. However, we want to review the traffic study when it is available.

Sincerely,

[Signature]
BRIAN K. MINAAI
Deputy Director

EX	LISTS		
BY	FILE		
DATE	BY	FILE	FILE
REC'D	JAN 20 2000	RAMTC	



DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 527-6663 • Fax: (808) 527-6675



JEREMY HARRIS
MAYOR

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR

BARRY FUKUNAGA
DEPUTY DIRECTOR
IN REPLY REFER TO:
RE 00-026

March 2, 2000

Mr. Francis Hirakami
Principal Engineer
Hawaiian Electric Company
P.O. Box 2750
Honolulu, Hawaii 96840-0001

Dear Mr. Hirakami:

Subject: Draft Supplemental Environmental Impact Statement (SEIS) Preparation
Notice for the Expansion of the Waimanalo Gulch Sanitary Landfill

Thank you for your comments dated January 14, 2000, regarding the subject Draft SEIS Preparation Notice for the expansion of the Waimanalo Gulch Sanitary Landfill. The following response to your comments will be included in the Draft SEIS:

1. Modifications to existing utilities, such as power lines or water sources, shall be restored or relocated according to requirements of the landfill operation and respective service provider.
2. The Draft SEIS will provide details regarding the planned construction work around existing structures as well as the proposed excavation work. All discussion will include project impacts and mitigation measures.
3. The Draft SEIS will provide discussion regarding existing conductor-to-ground clearance. This will include project impacts and mitigation measures to standards required by the State's General Order No. 8 (Rules for Overhead Electric Line Construction).
4. Portable and permanent litter fences will be installed at the working face of the site in relation to the prevailing winds to confine windblown litter. In the event of high winds, maintenance personnel will be on standby for litter collection off-site. At the end of each working day, the compacted refuse will be covered with approximately six inches of soil material to reduce vector, odor, fire and litter problems.

Should you have questions or require additional information, please do not hesitate to contact Joseph Hernandez of Waste Management of Hawaii, Inc., at 688-2995 (ext. 22).

Signature

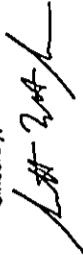
KENNETH E. SPRAGUE
Director

cc: Mr. Joe Hernandez - Waste Management of Hawaii, Inc.
Mr. Brian Takeda - R.M. Towill Corporation
Mr. Scott W.H. Seu - Hawaiian Electric Company, Inc.

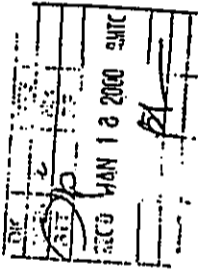
R.M. Towill, Corporation
January 14, 2000
Page 2

Our point of contact for this project, and the originator of these comments, is Francis Hirakami (543-7536) Principal Engineer. I suggest your staff and consultants deal directly with Francis to coordinate HECO's continuing input on this project.

Sincerely,



cc: F. Hirakami



January 14, 2000



Scott W.H. Seu, P.E.
Manager
Environmental Department

R.M. Towill, Corporation
Attn: Brian Takeda
420 Waiakamilo Road, Suite 411
Honolulu, HI 96817-4941

Dear Mr. Takeda

Subject: Waimanalo Gulch Sanitary Landfill

Thank you for the opportunity to comment on your October 1999 Draft Supplemental EIS Notice for the Waimanalo Gulch Sanitary Landfill, proposed by the City and County of Honolulu, Department of Environmental Services. We have reviewed the subject document and have the following comments:

1. Page 9, 3rd paragraph, 1st bullet states that "Modification to existing utilities, such as power lines or water sources, shall be restored to their pre-existing condition." HECO has existing 138KV and 46KV power lines crossing the Waimanalo Gulch. Any excavation work by the contractor in proximity to existing structures and anchors, or landfill operations resulting in inadequate ground clearance will necessitate permanent mitigation measures such as structures or line relocations, support structure, etc. Should any of these mitigation measures be implemented, restoration of the power lines to their pre-existing conditions will not be possible.
2. The Supplemental EIS should address the planned construction work in terms of the existing structure locations and where any excavation work is planned, and what mitigation measures will be implemented if the excavation work will impact the structural integrity of the wood and steel structure and accompanying guy wires and anchors.
3. The Supplemental EIS should address the planned construction work in terms of the existing conductor to ground clearance, and the proposed conductor to ground clearance following the landfill operations, and what mitigation measures will be implemented of the landfill operations will result in an inadequate conductor to ground clearance as required by the State's General Order No. 6 (Rules for Overhead Electric Line Construction).
4. The Supplemental EIS should address the prevention of debris flying up into the conductors by strong winds and causing power line outages.



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R. M. TOWILL CORPORATION
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January 17, 2000

Mr. Rodney Chiogioji
Cultural Surveys Hawaii
733 North Kalanooa Avenue
Kailua, Hawaii 96734

Dear Mr. Chiogioji:

Subject: Preparation of Final Archaeological Reconnaissance Survey and Assessment for
The Waimanalo Gulch Sanitary Landfill Project Site, Honouliuli, Ewa, Oahu

Please find enclosed, a copy of the response letter from the State Department of Land and Natural Resources, State Historic Preservation Division (SHPD) regarding the subject report prepared by your office. As required by SHPD, we would appreciate your assistance in revising the cover page and title page identifying the study as an archaeological inventory survey. Upon completion of this revision, please send two copies of the Final report to our office.

Should you have any question or require additional information, please do not hesitate to contact Debra Tom or myself at 842-1133.

Very truly yours,

Brian Takeda
Senior Planner

Enclosure

BT:dlt

cc: Ms. Wilma Namunnart (Department of Environmental Services)
Mr. Joe Hernandez (Waste Management of Hawaii, Inc.)



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
HISTORIC PRESERVATION DIVISION
501 Kalia Road, Room 555
Honolulu, Hawaii 96813

THE STATE OF HAWAII, DEPARTMENT OF LAND AND NATURAL RESOURCES, HISTORIC PRESERVATION DIVISION, IS HEREBY ISSUING THIS DOCUMENT.

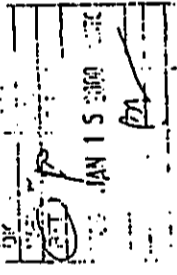
Brian Takeda
Page Two

an acceptable archaeological inventory survey has been done, with no historic sites being found in the project area -- with the understanding that the cover page and title page be revised identifying the study as an archaeological inventory survey and not a reconnaissance or assessment.

If you have any questions please call Sara Collins at 692-8026 or Elaine Jourdane at 692-8027.

Aloha,

Don Hibbard, Administrator
State Historic Preservation Division
Eljck



LOG NO: 24720
DOC NO: 0001E112

January 12, 2000

Brian Takeda
R. M. Towill Corporation
420 Waiakamilo Road, Suite 411
Honolulu, Hawaii 96817-4941

Dear Mr. Takeda:

SUBJECT: Chapter 6E-8 Historic Preservation Review -- Draft Supplemental Environmental Impact Statement Preparation Notice (SEISPN) for the Expansion of the Waimanalo Gulch Sanitary Landfill
Honouliuli, Ewa, O'ahu
TMK: 9-2-03:072, 073

Thank you for the opportunity to review the Supplemental EISPN for the proposed expansion of the existing Waimanalo Gulch Sanitary Landfill. The City & County of Honolulu proposes a 60.5 acre expansion of the landfill site within the 200 acres of the existing landfill property.

A review of our records shows that there are no known historic sites within the expansion area. An archaeological survey conducted in 1983 for the present landfill did not locate any historic sites although, in 1989 the SHPD recorded a petroglyph site (SIHP # 50-80-12-4110) located in the southwest corner of the present landfill area. In 1999, an archaeological reconnaissance survey conducted for the 60.5 acre expansion did not locate any archaeological or historic sites within the proposed expansion area. However, two sites, (remnants of Battery Arizona and a modern rock shrine) were located outside of the landfill expansion footprint and have been recommended for preservation.

We thank you for providing us a copy of *An Archaeological Reconnaissance Survey and Assessment for the Waimanalo Gulch Sanitary Landfill Project Site, Honouliuli, Ewa, O'ahu* (Hammatt and Shideler, August 1999). We do not review archaeological reconnaissance surveys under the State's historic preservation review process. However, this report is really an archaeological inventory survey report. It presents the former settlement pattern and likely sites that might be present, and then it documents that the parcel was adequately checked for sites and none were found. Thus, we can conclude that

RECEIVED JAN 15 2000

BOARD OF WATER SUPPLY
CITY AND COUNTY OF HONOLULU
30 SOUTH BERETANIA STREET
HONOLULU, HAWAII 96813



January 11, 2000

R.M. Towill Corporation
420 Waikamilo Road, Suite 411
Honolulu, Hawaii 96817-4941

Attention: Brian Takeda

Gentlemen:

Subject: Your Transmittal of December 14, 1999 of the
Supplemental Environmental Impact Statement
Preparation Notice for the Waimanalo Gulch
Sanitary Landfill Expansion, Waianae,
Oahu, IMK: 9-2-03: 72, 73

Thank you for the opportunity to review and comment on the document for the proposed
landfill expansion.

We have no objections to the proposed project. Waste disposal matters should be coordinated
with the State Department of Health.

If you have any questions, please contact Barry Usagawa at 527-5235.

Very truly yours,

CLIFFORD S. JAMILE
Manager and Chief Engineer

cc: Department of Environmental Services
Office of Environmental Quality Control

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 527-6663 • Fax: (808) 527-6676



March 2, 2000

MEMORANDUM

TO: CLIFFORD S. JAMILE, MANAGER AND CHIEF ENGINEER
BOARD OF WATER SUPPLY

ATTENTION: BARRY USAGAWA, PLANNING BRANCH

FROM: KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL SERVICES

SUBJECT: DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT
STATEMENT (SEIS) PREPARATION NOTICE FOR THE
EXPANSION OF THE WAIMANALO GULCH SANITARY LANDFILL

Thank you for your comments, dated January 11, 2000, regarding the subject Draft
SEIS Preparation Notice for the expansion of the Waimanalo Gulch Sanitary Landfill.
We acknowledge your comment that waste disposal matters should be coordinated with
the State Department of Health.

Should you have questions or require additional information, please do not hesitate to
contact Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (ext. 22).

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation

REMY HARRIS
MAYOR

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR

BARRY USAGAWA
DEPUTY DIRECTOR
IN REPLY REFER TO:
RE 00-0029

DK
RECEIVED
JAN 14 2000
RMT

Grace Pacific
CORPORATION

P.O. Box 78 • Honolulu, Hawaii 96810 • (808) 487-7916 • (808) 672-3345
FAX (808) 486-8025

January 6, 2000

Mr. Frank Doyle
City & County Of Honolulu
Department of Environmental Services
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Mr. Doyle,

I am writing to request that the following comments be addressed in the forthcoming Draft SEIS for the Waimanalo Gulch Sanitary Landfill Expansion.

- 1) what volume of additional landfill capacity, in cubic yards, will the proposed expansion provide?
- 2) of the volume in #1, how much is to be obtained through excavation?
- 3) of the excavated material noted in #2, how much will be retained on-site for cover material, roadways, etc?
- 4) how will the balance of the excavated material be disposed of?

Sincerely,



Robert M. Creps
Vice President Finance & Administration
Grace Pacific Corporation

cc: R.M. Towill Corporation
Office of Environmental Quality Control

2000-01-06 10:00 AM

DEPARTMENT OF ENVIRONMENTAL SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 527-4663 • Fax: (808) 527-6875

RAY HARRIS
MAYOR



KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR

SARY FURUKAWA
DEPUTY DIRECTOR
IN REPLY REFER TO:
RE 00-030

March 6, 2000

Mr. Robert M. Creps
Vice President Finance & Administration
Grace Pacific Corporation
P.O. Box 78
Honolulu, Hawaii 96810

Dear Mr. Creps:

Subject: Draft Supplemental Environmental Impact Statement (SEIS) Preparation
Notice for the Expansion of the Waimanalo Gulch Sanitary Landfill

Thank you for your comments regarding the subject Draft SEIS Preparation Notice for the expansion of the Waimanalo Gulch Sanitary Landfill. Your comments, dated January 6, 2000, will be used to prepare the Draft SEIS:

1. The proposed landfill expansion will provide approximately fourteen million cubic yards of additional landfill capacity.
2. The proposed landfill expansion will require the excavation of approximately 400,000 to 1 million cubic yards of material.
3. Almost all of the material excavated for construction of the proposed expansion is intended to remain onsite. The excavated material will be screened to produce soil, which will be used for cover material, roadways and other purposes associated with the landfill, and rock, which will be crushed and removed from the site.
4. As stated above, almost all material excavated for construction of the proposed expansion will remain onsite and not require disposal or removal.

Should you have questions or require additional information, please do not hesitate to contact Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (ext. 22).

Sincerely,



KENNETH E. SPRAGUE
Director

cc: Mr. Joe Hernandez - Waste Management of Hawaii, Inc.
Mr. Brian Takeda - R.M. Towill Corporation



January 3, 2000

JECH/MSB:MSB

Mr. Brian Takeda
 R. M. Towill Corporation
 420 Waiakamilo Road, Suite 411
 Honolulu, Hawaii 96817-4941

Dear Mr. Takeda:

Subject: Draft Supplemental Environmental Impact Statement Notice for the Expansion of the Waimanalo Gulch Sanitary Landfill

We received your letter dated December 14, 1999, regarding the draft Supplemental Environmental Impact Statement Preparation Notice for the expansion of the Waimanalo Gulch Sanitary Landfill site.

The Honolulu Fire Department requests that you maintain fire apparatus access throughout the construction site for the duration of the project.

Should you have any questions, please call Acting Battalion Chief Lloyd Rogers of our Fire Prevention Bureau at 831-7778.

Sincerely,

ATTILIO K. LEONARDI
 Fire Chief

AKL/LR:jo

REMY HARRIS
 MAYOR



March 2, 2000

KENNETH E. SPRAGUE, P.E., Ph.D.
 DIRECTOR

BARRY FUKUNAGA
 DEPUTY DIRECTOR
 IN REPLY REFER TO:
 RE 00-0027

MEMORANDUM

TO: ATTILIO K. LEONARDI, FIRE CHIEF
 HONOLULU FIRE DEPARTMENT

ATTENTION: LLOYD ROGERS, ACTING BATTALION CHIEF
 FIRE PREVENTION BUREAU

FROM: ✓ KENNETH E. SPRAGUE, DIRECTOR
 DEPARTMENT OF ENVIRONMENTAL SERVICES

SUBJECT: DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT (SEIS) PREPARATION NOTICE FOR THE EXPANSION OF THE WAIMANALO GULCH SANITARY LANDFILL

Thank you for your comments dated January 3, 2000, regarding the subject Draft SEIS Preparation Notice for the expansion of the Waimanalo Gulch Sanitary Landfill. Fire apparatus access will be maintained throughout the construction site for the duration of the project.

Should you have questions or require additional information, please do not hesitate to contact Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (ext. 22).

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
 Mr. Brian Takeda, R.M. Towill Corporation

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 537-6653 • Fax: (808) 537-6578



JEREMY HARRIS
MAYOR

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR

BARBARA FUKUNAGA
DEPUTY DIRECTOR
IN REPLY REFER TO:
RE 00-028

March 6, 2000

Ms. Genevieve Salmonson, Director
Environmental Quality Control Office
Department of Health
State of Hawaii
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

Dear Ms. Salmonson:

Subject: Draft Supplemental Environmental Impact Statement (SEIS) Preparation Notice for the Expansion of the Waimanalo Gulch Sanitary Landfill

Thank you for your comments, dated December 28, 1999, regarding the subject Draft SEIS Preparation Notice for the expansion of the Waimanalo Gulch Sanitary Landfill. The following response to your comments will be included in the Draft SEIS:

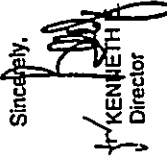
1. Almost all material from grading activities will be stockpiled onsite for use in the daily operation of the landfill. Soil material will be utilized for cover material and development of interior roadways and drainage systems. Rock will be crushed for aggregate and removed from the site. We anticipate that the above practices will greatly minimize the amount of material needing disposal or removal from the project site. The soil is not contaminated and will not be treated before leaving the site.
2. The existing landfill site is visible to the public from Farrington Highway, from the Nanakuli subdivision adjacent to the landfill, and from Ko Olina Resort. The proposed expansion will continue the 400-foot-wide buffer strip along the eastern portion with a north-south separation of 800 to 1,000 feet with ongoing landscaping to help mitigate some of the visual impacts.
Although mitigation to screen views of the landfill will be employed, the proposed project will continue to provide views of an active, working landfill. Photos of existing conditions will be used for a photo-analysis to evaluate visual impacts.
3. Due to active coordination with the residents and businesses in the surrounding community, there have been only two complaints received since 1989, the inception of the landfill. These complaints were filed by passing motorists at the State Department of Health regarding litter control. The use of portable and permanent fences will continue to be installed at the working face of the site in relation to the prevailing winds to confine windblown litter. Maintenance personnel will also remain on standby at all times in case of high winds for litter collection off-site.

Ms. Genevieve Salmonson
March 6, 2000
Page 2

4. We acknowledge your request to include an analysis of the project based on the Coastal Zone Management (CZM) Objectives listed in Hawaii Revised Statutes (HRS) 205A.
5. The proposed project is intended to address the need for additional safe and efficient disposal of Oahu's municipal solid waste from 2002 to 2017. The applicant will provide anticipated estimates of solid waste generation for the current year to the year 2020 in the DSEIS. The DSEIS will provide an analysis of the proposed expansion project and projection of waste generation. The DSEIS will also provide a discussion of existing and future plans to divert solid waste from landfills.
6. We acknowledge your request to include a discussion of findings and reasons for supporting the EISPN determination based on significance criteria listed in §11-200-12 of the Environmental Impact Statement (EIS) rules.

Should you have questions or require additional information, please do not hesitate to contact Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (ext. 22).

Sincerely,


KENNETH A. SPRAGUE
Director

cc: Mr. Joe Hernandez - Waste Management of Hawaii, Inc.
Mr. Brian Takeda - R.M. Towill Corporation



STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

338 SOUTH BERTANAMA STREET
SUITE 101
HONOLULU, HAWAII 96813
TELEPHONE (808) 586-4188
FACSIMILE (808) 586-4189

December 28, 1999

Mr. Kenneth E. Sprague, Director
City and County of Honolulu
Department of Wastewater Management
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Sprague:

Subject: EIS Preparation Notice for the Waimanalo Gulch Sanitary
Landfill Expansion, Waianae, Oahu

Thank you for the opportunity review the subject document. We have the following comments and questions.

1. Please describe whether the grading activity would generate any excess soils. If so, please describe where the soils would be disposed? Are the soils contaminated? Would the soils be treated before disposal?
2. Please illustrate the visual impacts of the landfill from public places such as roads and lookouts. Photos of existing conditions taken from public view points are helpful in evaluating visual impacts. Renderings of future conditions superimposed on photos of existing views should be provided.
3. Please provide a list of all complaints received on the landfill since its inception. Please describe what steps will be taken in this second phase to avoid or minimize similar complaints.
4. Please analyze the project based the Coastal Zone Management Objectives listed in HRS 205A.
5. The proposed project is intended to address the need to provide sufficient space for disposal of Oahu's MSW from 2002 to 2017. What is the anticipated solid waste disposal amount for each of the affected years? How much additional capacity will be provided by this project? Do the disposal projections match the proposed landfill capacity? If not,

Mr. Sprague
Page 2

GENEVIEVE SALMONSON
DIRECTOR

please explain the discrepancy. Please describe existing and future plans to keep solid waste away from landfills.

6. Discuss the findings and reasons for supporting the EISPN determination based on the significant criteria listed in §11-200-12 of the EIS rules.

should you have any questions please call Jeyan Thirugnanam at 586-4185.

Sincerely,

Genevieve Salmonson
Genevieve Salmonson
Director

c: R.M. Towill
Planning and Permitting

DK	KTS
WSS	MS
RTT	EF
RECD DEC 30 1999 BMTG	



**DEPARTMENT OF BUSINESS,
ECONOMIC DEVELOPMENT & TOURISM**

OFFICE OF PLANNING

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Ref. No. P-834

December 23, 1999

RODOLPH J. CAFFREY,
GOVERNOR
SHEILA F. MATSUOKA,
COMMISSIONER
BRADLEY J. MOSSMAN,
DEPUTY DIRECTOR
DAVID W. BLANE,
DIRECTOR, OFFICE OF PLANNING

DK	KTS	12/23/99
WES	MA	
1/14	SE	
REC'D	DEC 27 1999	RMTC

*what about?
this is wrong?
what do we
do now?*

Dear Project Manager:

Subject: Environmental Assessment and Environmental Impact Statement Reviews

For your information, the Hawaii Coastal Zone Management (CZM) Program is no longer routinely reviewing environmental assessment and environmental impact statement reports. If there are any questions, please call John Nakagawa of our CZM Program at (808) 587-2878.

Sincerely,

David W. Blane
David W. Blane
Director
Office of Planning

U S D E P T O F B U S I N E S S E C O N O M I C D E V E L O P M E N T & T O U R I S M

APPENDIX J

**Comments and Responses to the
Draft Supplemental Environmental
Impact Statement (SEIS)**

CLAUDE BOHANNON
MAJOR GENERAL EDWARD L. C. ...
DIRECTOR OF CIVIL DEFENSE

EDWARD T. TEIXEIRA
VICE DIRECTOR OF CIVIL DEFENSE



STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE DIRECTOR OF CIVIL DEFENSE
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-495

PHONE 808 733-0300
FAX 808 733-4677



DEPT. OF ENVIRONMENTAL AFFAIRS
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, HONOLULU, HAWAII 96813
PHONE: 808 537-8663 • FAX: 808 537-8978



JEREMY HARRIS
MAYOR

TIMOTHY E. STEINBERGER, P.E.
ACTING DIRECTOR
IN REPLY REFER TO:
NE 01-070

May 14, 2001

TO: Department of Environmental Services
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

ATTENTION: Ms. Wilma Namumnart

FROM: Edward T. Teixeira
Vice Director of Civil Defense

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE
WAIMANALO GULCH SANITARY LANDFILL EXPANSION

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Waimanalo Gulch Sanitary Landfill Expansion, Ewa, Oahu, State of Hawaii, Tax Map Key 9-2-03: 072 and 073.

We do not have any comments or recommendations on the DEIS.

Technicians and planners are available to assist and answer any questions you may have. If there are any questions, please have your staff call Mr. Norman Ogasawara, State Civil Defense, at 733-4300.

c: Mr. Randall K. Fujiki
Department of Planning and Permitting
650 South King Street, 7th Floor
Honolulu, HI 96813

LTC Ron Swafford
HIARNG Environmental Section

Mr. Brian Takeda
R. M. Towill Corporation, Inc.
420 Waikamilo Road, Suite 411
Honolulu, HI 96817-4941

Hawaii Civil Defense Agency

Mr. Edward T. Teixeira
Vice Director of Civil Defense
Office of the Director of Civil Defense
State Department of Defense
3949 Diamond Head Road
Honolulu, Hawaii 96816

Dear Mr. Teixeira:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your letter dated August 29, 2000, concerning the subject Draft SEIS. We acknowledge that you have no comments or recommendations on the proposed project.

We appreciate your review of the Draft SEIS. Should you have any further comments, please contact Ms. Wilma Namumnart at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (extension 22)

Sincerely,

TIMOTHY E. STEINBERGER
Acting Director

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation

Mr. Kenneth E. Sprague
August 28, 2000
Page 2

ESTHER UEIDA
EXECUTIVE OFFICER

the Commission's official map, O-6 (Ewa), which depicts the updated boundaries.

5) We acknowledge that in the event the City and County of Honolulu Planning Commission recommends approval of the amendment to the special permit, a copy of the decision together with the complete record of the proceeding will be transmitted to the LUC for final disposition, pursuant to §205-6, Hawaii Revised Statutes.

We have no further comments to offer at this time. We appreciate the opportunity to comment on the subject DSEIS.

Should you have any questions, please feel free to call me or Bert Saruwatari of our office at 587-3822.

Sincerely,

ESTHER UEIDA
Executive Officer

EU:aa

Enclosure

c: OEGC (w/encl.)
/R.N. Towill Corporation (w/encl.)
Waste Management of Hawaii, Inc. (w/encl.)



STATE OF HAWAII
DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM
LAND USE COMMISSION

P.O. Box 2359
Honolulu, HI 96804-2359
Telephone: 808-587-3822
Fax: 808-587-3827

August 28, 2000

Mr. Kenneth E. Sprague, Director
Department of Environmental
Services
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Sprague:

Subject: Draft Supplemental Environmental Impact Statement (DSEIS)
for Waianalo Gulch Sanitary Landfill Expansion, TRX 9-2-03:
72 and 73

We have reviewed the DSEIS for the subject project and have the following comments:

- 1) We confirm that the proposed expansion site is designated within the State Land Use Agricultural District. We note that the existing landfill site was established under LUC Docket No. SP87-362/Department of Public Works, City and County of Honolulu, pursuant to Findings of Fact, Conclusions of Law, and Decision and Order dated April 20, 1987. The site was further expanded by an additional 26 acres of land for a total permit area of 86.5 acres, pursuant to Findings of Fact, Conclusions of Law, and Decision and Order dated October 31, 1989. Mine conditions were imposed upon the approval (conditions enclosed). Clarification should be provided regarding the applicant's efforts to comply with the conditions of approval.
- 2) Clarification should be provided as to how the expansion area was determined to be 60.5 acres. Was a map and bounds map of said area prepared? If so, it should be provided in the Final EIS.
- 3) An assessment of how the proposed use is not contrary to each of the 10 objectives of the Coastal Zone Management program (Chapter 205A, HRS) should be provided.
- 4) We note that Figure 1-5 does not reflect the current land use districts in the area. We have enclosed a copy of a portion of

9.

DK	JOIS		
WES	NIM		
RTT	RF		
RECD AUG 30 2000 RARC			

ORDER

IT IS HEREBY ORDERED that an Amendment to Special Permit Docket Number 87-362 to expand the existing approved area by approximately 26 acres situate within the State Land Use Agricultural District at Waimanalo Gulch, Honouliuli, Ewa, Oahu, Tax Map Key Number: 9-2-03: portion of parcel 2, and approximately identified on Exhibit A attached hereto and incorporated by reference herein be approved subject to the following eight conditions of the original Special Permit and the additional condition as recommended by the Planning Commission:

1. That an earth berm shall be installed prior to the commencement of any waste disposal operations.
2. The landscaping plans which would include plant names, sizes, quantities and location shall be submitted to the Department of Land Utilization for approval and shall be implemented within 90 days of completion of the berm work.
3. The facility shall be operational between the hours of 7:00 a.m. and 4:30 p.m. daily.
4. The applicant shall obtain all necessary approvals from the State Department of Health, Department of Transportation, and Board of Water Supply for all on-site and off-site improvements involving access, storm drainage, leachate control, water and wastewater disposal.
5. The Planning Commission or Director of Land Utilization may at any time impose additional conditions when

it becomes apparent that a modification is necessary and appropriate.

6. The applicant shall notify the Planning Commission of termination of use for appropriate Planning Commission action or disposition of the permit.
7. That the project be completed and operating within 3 years of the approval of the special use permit.
8. That the City and County of Honolulu indemnify and hold harmless the State of Hawaii and all of its agencies and/or employees for any lawsuit or legal action relating to any groundwater contamination, noise, or odor pollution relative to the operation of the landfill.
9. Petitioner shall coordinate construction and operation of the landfill with the Hawaiian Electric Company.



0-6 (E.A.)



DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, HONOLULU, HAWAII 96813
PHONE: (808) 537-8083 • FAX: (808) 537-5673



JEREMY HARRIS
MAYOR

TIMOTHY E. STEINBERGER, P.E.
DEPUTY DIRECTOR
IN REPLY REFER TO:
PE 01-044

April 24, 2001

Ms. Esther Ueda
Executive Officer
Land Use Commission
P.O. Box 2359
Honolulu, Hawaii 96804

Dear Ms. Ueda:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your comments dated August 28, 2000, concerning the subject Draft SEIS. We offer the following in response:

1. We acknowledge the designation of the site within the State Agricultural District. All conditions of LUC Docket No. SP87-362, Department of Public Works, City and County of Honolulu, have been complied with.
2. The determination of the proposed expansion area is based on the existing property boundary of the site. All work proposed will be contained entirely within the existing property. No further delineation of the site is therefore proposed.
3. An assessment of the proposed activity in relation to objectives of the Coastal Zone Management (CZM) program, Chapter 205A, Hawaii Revised Statutes (HRS), will be provided in the forthcoming Revised Draft SEIS.
4. We acknowledge and appreciate your updated delineation of the State Land Use District Boundaries.
5. You have indicated that should the Planning Commission recommend approval of the amendment to the Special Use Permit, that a copy of the decision and record will be transmitted to the LUC for final disposition.

Ms. Esther Ueda
April 24, 2001
Page 2

We appreciated your review of the Draft SEIS. Should you have any further comments please contact Ms. Wilma Namunnart of our office at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (extension.22).

Sincerely,

TIMOTHY E. STEINBERGER
Deputy Director

Enclosure

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation

DAVID W. BLAKE
DIRECTOR, OFFICE OF ENERGY

DEPARTMENT OF BUSINESS,
ECONOMIC DEVELOPMENT, AND TOURISM

Energy Resources and Technology Division
235 South Beretani Street, Lele, Honolulu, HI 96813
Address: P.O. Box 2008, Honolulu, HI 96808
Web site: www.hawaii.gov/economic

P. 02

SHAMON E. MURPHY
DIRECTOR

Telephone (808) 587-3007
FAC (808) 587-3000

August 21, 2000

Dr. Kenneth Sprague, Director
Department of Environmental Services
City and County of Honolulu
650 S. King Street
Honolulu, Hawaii 96813

Subject: Draft Supplemental EIS for the
Waimanalo Gulch Sanitary Landfill Expansion

Dear Dr. Sprague:

Thank you for the opportunity to comment on this subject project. Given the potentially significant environmental impacts resulting from expanding the existing landfill footprint, from 86.5 to 147 acres, it is critical to look at the alternatives to a large expansion of the landfill.

While the City and County has developed a number of very successful programs to divert material from the landfill, there are additional areas of potential development such as reuse and source reduction programs.

Reuse of materials through support of a materials reuse/exchange facility has proven to be successful in a number of urban and rural communities. Diversion of furniture, construction and demolition and other related material could substantially reduce the amount of material going to landfills and illegal dumps. If the facility were operated by a non-profit organization, individuals and businesses could receive tax deductions and reduced disposal costs, while supporting a worthy non-profit organization.

In conjunction with the Department of Health and the Hawaii Food Industry Association, the City and County should also continue to evaluate financial methods for support of recycling such as redemption programs. Programs such as these could yield valuable results to the recycling industry and divert significant volumes of material from the landfill.

We also believe that there should be greater attention to the management and possible use of the methane produced by the landfill. The methane offers a potential opportunity to meet some of Oahu's energy needs, or, at a minimum, should be flared to reduce methane emissions into the atmosphere.

In addition, we have the following comments regarding the project's effects on the environment and climate change:

1. The Draft Supplemental Environmental Impact Statement (DSEIS) does not fully consider provisions of the Hawaii State Plan, particularly Act 176, Session Laws of Hawaii 2000. The 2000 Legislature made its concern about greenhouse gas emissions clear by adding a fourth objective to Chapter 226-18, Hawaii Revised Statutes, which states that "Planning for the State's facility systems with regard to energy shall be directed toward the achievement of the following objectives, giving due consideration to all:

- (1) Dependable, efficient, and economical statewide energy systems capable of supporting the needs of the people;
- (2) Increased energy self-sufficiency where the ratio of indigenous to imported energy use is increased;

- (3) Greater energy security in the face of threats to Hawaii's energy supplies and systems; and
- (4) Reduction, avoidance, or sequestration of greenhouse gas emissions from energy supply and use." (emphasis added)

The same Act, Act 176, added the following new State policy: "Support actions that reduce, avoid, or sequester greenhouse gases in utility, transportation, and industrial sector applications." The DSEIS should address the projects impact on these provisions.

The City and County should consult the recommendations of Chapter 11 of the Hawaii Climate Change Action Plan (HCCAP) (enclosed). The HCCAP was published in November 1998 jointly by the Department of Business, Economic Development & Tourism and the Department of Health under a Cooperative Agreement with the U.S. Environmental Protection Agency (USEPA).

Chapter 11 of the HCCAP was prepared by the University of Hawaii Environmental Center (UHEC). Based on information available at the time, in 1996, the Waimanalo Landfill held about 600,000 tons of municipal solid waste (MSW). With the annual addition of about 292,000 tons per year, by the end of this year, the landfill will hold about 1,768,000 tons, and in fifteen more years will contain about 4,380,000 tons. This does not include ash from H-POWER, which is assumed to produce little in the way of emissions.

According to the USEPA's Landfill Gas-to-Energy Project Development Handbook (1996) as cited by UHEC in the HCCAP, recommends that any landfill with greater than one million tons waste in place consider converting methane to energy. Further, USEPA performance standards required capturing or flaring of gas from operative landfills which: (a) have greater than 2.75 million tons design capacity; (b) accepted waste after November 1987; and (c) have non-methane organic compound emissions of greater than 50 tons per year. While we do not know the landfill's current or projected non-methane organic compound emissions, these provisions should be considered.

The City and County should reconsider installing equipment to vent and flare methane to reduce methane emissions from Waimanalo Landfill. Another option would be to install equipment to refine, transport, or burn methane for energy, thereby providing productive uses of the gas and generating revenues to offset some costs. Use of methane could also contribute to meeting State energy objectives seeking diversification, use of indigenous energy sources, energy security, and greenhouse gas reduction.

Thank you for the opportunity to offer these comments.

Very truly yours,

Maurice H. Kaya
Maurice H. Kaya
Energy, Resources, and Technology
Program Administrator

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, HONOLULU, HAWAII 96813
PHONE: 808/537-4800 • FAX: 808/537-4803

RTS	RTS	RTS	RTS
WES	WES	WES	WES
MP	MP	MP	MP
RT	RT	RT	RT
NA	NA	NA	NA
BRT	BRT	BRT	BRT
MAY 03 2001			
MAY 03 2001			
MAY 03 2001			
MAY 03 2001			

TIMOTHY E. STEINBERGER, P.E.
ACTING DIRECTOR
IN REPLY REFER TO:
PE 81-046

May 1, 2001

JUDITH HANES
Director

Mr. Maurice H. Kaya
Energy, Resources, and Technology
Program Administrator
State Department of Business,
Economic Development, and Tourism
235 South Beretania Street
Leleopapa A Kamehameha Building, 8th Floor
Honolulu, Hawaii 96813

Dear Mr. Kaya:


Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your comments dated August 21, 2000, concerning the subject Draft SEIS. We offer the following in response:

1. Materials Reuse and Recovery - The City and County of Honolulu will continue to investigate new and proven methods to further enhance its recycling and materials recovery programs. The adoption of such programs must provide for environmental benefits, as well as demonstrate financial and technical feasibility, for incorporation into the City's waste management system.
2. Act 176, Session Laws of Hawaii - Recovery of landfill-associated gasses is proposed with the Waimanalo Gulch Sanitary Landfill Expansion.
3. Chapter 11, Hawaii Climate Change Action Plan - As indicated, we will be implementing landfill gas recovery. If sufficient amounts are recovered, we will consider selling the gasses or electrical power. Since the landfill site is adjacent to the Hawaiian Electric Kahala Power Generating Station, the distance and cost to supply landfill gas and/or electric power will be minimized.

We appreciate your review of the Draft SEIS. Should you have any further comments please contact Ms. Wiama Namumart of our office at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (extension 22).

Sincerely,



TIMOTHY E. STEINBERGER
Acting Director

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towai Corporation

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU
PACIFIC PARK PLACE • 711 KEMAHU BOULEVARD, SUITE 1206 • HONOLULU, HAWAII 96813
PHONE: (808) 537-4338 • FAX: (808) 537-4770



JEREMY HARRIS
MAYOR

CHERYL D. SOON
DIRECTOR
DEPARTMENT OF
ENVIRONMENTAL SERVICES

August 21, 2000

TPD/00-0333R

MEMORANDUM

TO: KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL SERVICES

ATTN: WILMA NAMUMNART, REFUSE DIVISION

FROM: CHERYL D. SOON, DIRECTOR

SUBJECT: WAIMANALO GULCH SANITARY LANDFILL EXPANSION

We have reviewed the draft supplemental environmental impact statement (DSEIS) prepared for the subject project. The following comments are the result of this review:

1. The proposed project does not affect streets under City jurisdiction. In view of this, we have no objections to the project.
2. Pages 1-17 and 4-3 of the DSEIS and Page 3 of Appendix IV (Traffic Assessment and Recommendations) include a statement that proper timing of the nearest traffic signals could provide gaps between platoons of traffic that would allow movements into and out of the landfill access road to continue with minimal delay. It appears that the signals are too far away from the landfill access road to provide any significant gaps between platoons of traffic.

Should you have any questions regarding these comments, please contact Faith Miyamoto of the Transportation Planning Division at Local 6976.

Cheryl D. Soon
CHERYL D. SOON

cc: Office of Environmental Quality Control
Randall K. Fujiki, Department of Planning and Permitting
Brian Takeda, R. M. Towill Corp., Inc.

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU
850 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 537-8903 • Fax: (808) 537-8975



JEREMY HARRIS
MAYOR

TIMOTHY E. STEINBERGER, P.E.
DEPUTY DIRECTOR
IN REPLY REFER TO:
PE 01-048

April 24, 2001

Ms. Cheryl D. Soon, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your comments dated August 21, 2000, concerning the subject Draft SEIS. We offer the following in response:

1. We acknowledge that you do not object to the proposed project.
2. We acknowledge your statement concerning the distance of traffic signals from the intersection of the sanitary landfill access road with Farrington Highway. According to the Traffic Assessment and Recommendations in the Draft SEIS, the minor street volumes at this intersection would likely not meet the minimum volumes needed to satisfy any of the volume warrants for traffic signals.

We appreciated your review of the Draft SEIS. Should you have any further comments please contact Ms. Wilma Namumart of our office at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (extension 22).

Sincerely,
Timothy E. Steinberger
TIMOTHY E. STEINBERGER
Deputy Director

Enclosure

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation

JW MARRIOTT IHI LANI
RESORT AND SPA
at Ko Olina

July 27, 2000

Department of Environmental Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

Subject: Waimanalo Gulch Landfill Expansion

Ladies and Gentlemen of Environmental Services:

Though I received no acknowledgement to my letter of July 5, 2000, I will take advantage of the extended comment period by offering a compromising recommendation.

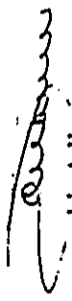
If your department is unwilling to eliminate or relocate the eyesore that welcomes visitors and residents to the Waianae coast, I would suggest an action be taken to alleviate the present intolerable situation.

Prohibit the dumping of all paper products and lightweight plastics (predominantly plastic bags). This would save thousands of man-hours in retrieving wayward refuse both at the landfill and our highway beautification program.

Secondly, if a road was graded from Kapolei to the landfill north of Farrington Highway it would help keep the approach to Waianae clean and keep over 100 lumbering trucks daily off our adopted highway. It would also be considerably closer to the proposed landfill extension.

Thank you for your consideration.

Respectfully yours,



John A. Homér
General Manager

JAH:lla

cc: Office of Environmental Quality Control
R.M. Towill Corporation

SEARCHED	INDEXED	SERIALIZED	FILED
JUL 31 2000			
HAWAII			

U.S. GOVERNMENT PRINTING OFFICE: 2000 O-481-100



Department of Environmental Services
 Page two
 July 5, 2000

DK	RTS	
WES	NM	
RT	RF	
REC'D JUL 07 2000 BMT/C		

Please reconsider your proposal and I am available to you if you wish me to expand on or clarify my concerns.

Respectfully yours,

John A. Homer
 General Manager

JAH:lla

cc: Office of Environmental Quality Control
 R.M. Towill Corporation

July 5, 2000

Department of Environmental Services
 City and County of Honolulu
 650 South King Street, 3rd Floor
 Honolulu, HI 96813

Subject: Waimanalo Gulch Landfill Expansion

Ladies and Gentlemen of Environmental Services:

As General Manager of the JW Marriott Ihilani Resort I feel a responsibility, not only to the Owners but also to Hawaii, to help promote the islands and develop the economy of my community.

To live with the present landfill situation has proven difficult but I felt it came with the territory. There was light at the end of the tunnel. Your proposal to extinguish that light by expanding the landfill lease appears to be poor business sense.

We are committed to a development within this Resort that will house and feed 2,000 visitors per day, 365 days per year. Their impression of Hawaii to a great degree will be influenced by their environment. Lumbering refuse trucks spewing out garbage in the shadow of a scarred mountainside hardly conjures up a Hawaii vacation. Every three months fifty of our associates (myself included) volunteer a Saturday morning to clear two miles of Farrington Highway of litter in an effort to relieve the eyesore on the approach to the Resort.

Our interest and concerns are genuine and I do not wish to minimize the difficult decision to relocate a garbage disposal site. However, the present proposal inhibits the progress of our economy and the future development of the Waianae coast.

[Faint, illegible text]



DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

850 SOUTH KING STREET, HONOLULU, HAWAII 96813
PHONE: (808) 527-4600 • FAX: (808) 527-4675



SENDAY HARRIS
MAILER

TIMOTHY E. STEINBERGER, P.E.
DEPUTY DIRECTOR
BY REPLY REFER TO:
HC 01-048

April 24, 2001

Mr. John A. Homer, General Manager
JW Marriott Ihilani Resort and Spa at Ko Olina
92-1001 Olani Street
Kapolei, Hawaii 96707

Dear Mr. Homer:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gutch Sanitary Landfill Expansion

Thank you for your letters dated July 5 and 27, 2000, concerning the subject Draft SEIS. We offer the following in response:

1. We acknowledge the situation you describe involving littering of plastic and paper products and believe there are two sources: 1) refuse trucks which have not properly secured their loads; and 2) high wind conditions at Waimanalo Gutch and the surrounding area. ENV has advised refuse trucking firms to be diligent in covering their refuse loads. HPD has also been asked to cite any offenders which litter our streets and highways. Commercial and City refuse vehicles leaving the landfill are being inspected to ensure they have thoroughly cleaned out their vehicle beds prior to leaving the site and/or resecured their covers.

As you may be aware, Waste Management of Hawaii has a work crew on standby to pick up litter whenever there are incidences of windblown litter deposited onto the highway and the Ko Olina area. We ask for your assistance in notifying Waste Management whenever there are problems so that immediate action can be taken.

The issue of high winds contributing to litter is being addressed by an aggressive program involving the use of fencing, work crews, and new equipment. Fencing designed to capture litter had been previously cleaned by use of hand tools. Work crews will be provided with new equipment, such as MadVac, which

Mr. John A. Homer
April 24, 2001
Page 2

incorporates a vacuum device to speed the pickup of litter. This equipment will be truck-mounted to also facilitate the removal of litter from off-site localities.

Additional measures are under consideration and include your suggestion for the prohibition of paper and lightweight plastics going to the landfill. The potential use of this measure, however, will require further analysis to determine if it is possible to further recycle these materials.

2. We have investigated the potential for construction of a second access road to the site. A new access road is not considered a viable option due to engineering constraints involving slope, grade, and need for eventual access back to Farrington Highway. It is expected that, with the proposed landfill expansion, space currently used for the existing landfill could become available for queuing of refuse vehicles within the site.

We appreciated your constructive review of the Draft SEIS. Should you have any further comments please contact Ms. Wilma Namumart of our office at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (ext. 22).

Sincerely,

TIMOTHY E. STEINBERGER
Deputy Director

Enclosure

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation



STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 118, HONOLULU, HAWAII 96810

LETTER NO. (P) 1360.0

JEREMY HARRIS
MAYOR

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 521-5663 • Fax: (808) 521-5675



TIMOTHY E. STEINBERGER, P.E.
DEPUTY DIRECTOR
BY MAIL REFER TO:
RE 01-048

April 24, 2001

Department of Environmental Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

Attention: Ms. Wilma Namunnart
Gentlemen:

Subject: Waimanalo Gulch Sanitary Landfill Expansion
Draft Environmental Impact Statement (DEIS)
Ewa, Oahu, Hawaii
Tax Map Keys: (1) 009-002-003: 072, 073

Thank you for the opportunity to review the DEIS for the subject project.

The proposed project does not impact any of our facilities, therefore, we have no comments to offer.

Should you have further questions regarding the above, please have your staff contact Mr. Ralph Yukumoto of the Planning Branch at 586-0488.

Sincerely,

GORDON MATSUOKA
Public Works Administrator

RY:mo
c: Dept of Planning & Permitting
R.M. Towill Corp.
OEQC

Mr. Gordon Matsuoaka
Public Works Administrator
State Department of Accounting and General Services
Kalanimoku Building
P.O. Box 119
Honolulu, Hawaii 96810

Dear Mr. Matsuoaka:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your letter dated July 18, 2000, concerning the subject Draft SEIS. We acknowledge your comment that the proposed project will not impact any of the facilities under DAGS jurisdiction.

We appreciated your review of the Draft SEIS. Should you have any further comments please contact Ms. Wilma Namunnart of our office at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (extension 22).

Sincerely,

TIMOTHY E. STEINBERGER
Deputy Director

Enclosure

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takéda, R.M. Towill Corporation





WAIANAE COAST NEIGHBORHOOD BOARD NO. 24

99 NEIGHBORHOOD COMMISSION • CITY HALL, ROOM 409 • HONOLULU, HAWAII 96813

July 14, 2000

Dr. Kenn Sprague, Director
Department of Environmental Services
650 South King Street, 3rd Floor
Honolulu, HI 96813

Re: Waimanalo Gulch Landfill Expansion - Draft Supplemental EIS

Dear Dr. Sprague:

During the July 5, 2000, regular Wai anae Coast Neighborhood Board No. 24 meeting, the Board heard a recommendation from its Planning and Zoning committee to support the expansion of the Waimanalo Gulch Landfill. In the course of open discussion with the full set of board members and the public, additional positions and information was presented. At this time, the recommendation was withdrawn and a subsequent motion was made.

The motion was made to oppose the expansion of the Waimanalo Gulch Landfill until the Draft EIS is satisfactorily addressed to the public. The motion passed by a vote of 15 ayes - 0 nays - 1 abstention.

Concerns regarding the project included: the apparent failure to follow through on the original EIA, stating once the facility was at the capacity allowed by the original EIS the facility would be closed and another location sought for a landfill, continuing concern regarding the lack of total control of debris (flying plastic bags/papers/etc.), traffic and mud from trucks coming out from the landfill, flying debris from supposedly empty trucks, dust control, etc.

If you have any questions regarding the Board's position, please do not hesitate to contact me at 696-0131.

Sincerely,

Cynthia K. L. Rezendes, Chair
Wai anae Coast Neighborhood Board No. 24

cc: Neighborhood Commission
Councilmember John DeSoto
Representative Mike Kahikina
Representative Emily Aunwai
Senator Colleen Hanabusa
R.M. Towill Corporation, Attn: Brian Takeda

W0821450004



Oahu's Neighborhood Board System - Established 1973

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

REFUSE DIVISION
650 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 537-4344 • Fax: (808) 537-5864



JEREMY HARRIS
MANAGER

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR
FRANK J. DOYLE, P.E.
Chief

IN REPLY REFER TO:
DE 00-092

July 17, 2000

Ms. Cynthia Rezendes, Chairperson
Wai anae Neighborhood Board No. 24
87-149 Maipela Street
Wai anae, Hawaii 96792

Dear Ms. Rezendes:

SUBJECT: Notice of Extension of Receipt of Comments for the
Waimanalo Gulch Sanitary Landfill Expansion Supplemental EIS,
Waimanalo Gulch, Island of Oahu

The receipt of public comments for the subject Draft Supplemental EIS has been extended from July 7, 2000, to August 21, 2000. Please provide notice of this extension at your next regularly scheduled meeting of the Wai anae Neighborhood Board.

Should you have any questions please contact Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985, or Mr. Brian Takeda, R.M. Towill Corporation, at 842-1133.

Sincerely,

KENNETH E. SPRAGUE
Director

cc: Councilmember John DeSoto
OECC



LIFE OF THE LAND

Ma Manu Ke Ea O Ke Aina ? Ke Pono
Hawaii's Own Local Community Action Group
Protecting our Fragile Natural & Cultural Resources
through Research, Education, Advocacy & Litigation

July 7, 2000

Department of Environmental Services
City and County of Honolulu
650 South King Street, Third Floor
Honolulu, Hawaii 96813

R.M. Towill Corporation
420 Waiakamilo Road, Suite 411
Honolulu, Hawaii 96817
RNTC Ref No. 1 - 18573 - OE

Re: Draft Supplemental Environmental Impact Statement for the
Waimanalo Gulch Sanitary Landfill Expansion - Waimanalo Gulch,
Island of O'ahu - TMK 9-2-03-072 and 073 - April 2000

Aloha!

Life of the Land appreciates this opportunity to review and comments on the Draft
Supplemental Environmental Impact Statement (DSEIS) for the proposed Waimanalo
Gulch Sanitary Landfill Expansion.

Distribution of DSEIS:

Hawaii Administrative Rules Title 11 - Chapter 200 Subchapter 7 Section 11-200-
15 Consultation prior to filing a draft environmental impact statement states:
(5) *In the preparation of a draft EIS, proposing agencies and applicants shall consult all
appropriate agencies noted in section 11-200-10(10) and other citizen groups,
concerned individuals as noted in section 11-200-9 and 11-200-9.1.*

76 North King Street • Suite 203 • Honolulu, Hawaii 96817

phone • fax • e-mail: 533-3454 • 533-0993 • lifeo@hland@hotmail.com

Life of the Land Comments on DSEIS for
Waimanalo Gulch Sanitary Landfill Expansion
July 6, 2000
Page Two

Section 11-200-9(1) states:

(1) *Seek, at the earliest practicable time, the advice and input of the county
agency responsible for implementing the county's general plan for each county in which the
proposed action is to occur, and consult with other agencies having jurisdiction or expertise
as well as those citizen groups and individuals which the proposing agency
reasonably believes to be affected.*

Life of the Land notes that neither the Makakilo/Kapolei/Honokai Hale
Neighborhood Board No. 34, in whose district this project is proposed, nor the Ko Olina
Community Association, one of the Landfill's nearest neighbors, were originally sent this
document for review. Both of these entities are concerned about this project and its
impacts on them. Why weren't they consulted parties on this project?

We further note that the developer went to the Wai'anae Coast Neighborhood
Board No. 24 to present this project, but totally by-passed the Neighborhood Board in
the district where the project is proposed. Why was this project not presented to the
Neighborhood Board in its own community?

After Neighborhood Board No. 34 requested a copy of this document, will they be
afforded the full 45-day review period?

Will the Ko Olina Community Association be afforded the full 45-day review period
commencing with the date of their receipt of this document?

Project Summary:

We find it odd that the Proposing Agency and the Accepting Authority are the
same - namely the Department of Environmental Services.

Chapter 343-5(b) states: *...The final authority to accept a final statement shall rest
with: (2) The mayor, or the mayor's representative, of the respective county whenever an
action proposes only the use of county lands or county funds.*

Who is the Accepting Authority?

Alternatives:

This section is inadequate. Hawaii Administrative Rules Title 11 - Chapter 200
Section 11-200-17(j) Content Requirements states:

The draft EIS shall describe in a separate and distinct section alternatives which could attain the objectives of the action, regardless of cost, in sufficient detail to explain why they were rejected. The section shall include a rigorous exploration and objective evaluation of the environmental impacts of all such alternatives

Life of the Land Comments on DSEIS for
Waimanalo Culch Sanitary Landfill Expansion
July 6, 2000
Page Three

actions. Particular attention shall be given to alternatives that might enhance life of the environmental quality or avoid, reduce, or minimize some or all of the adverse environmental effects, costs, and risks.

Solid Waste Management is a hot topic across the country and yet this document considers only 4 alternatives:

Alternative 1: No Action. Under this section, your justification for rejecting this alternative in favor of expansion is that "...collection would be restricted and the public may resort to illegal dumping of waste products in vacant yards and along roadways. H-POWER-related ash would also overflow the storage areas and spill over to adjoining lands, causing various health discomforts or possible hazards."

The State of Hawaii Department of Health Office of Solid Waste Management's Draft Hawaii 2000 Plan for Integrated Solid Waste Management states on Page 2-30: "...The C&C continues to investigate alternative uses for its ash, and currently has federal assistance to develop secondary markets."

What alternative uses for ash have been explored?

What type and/or amount of federal assistance has been received to develop secondary markets for H-POWER's ash?

Alternative 2: Delayed Action. Your justification for rejecting this alternative in favor of expansion is that it would result in a "...loss of time needed to design, analyze and assess impacts and options for a new or expanded facility."

What other options and/or technologies were investigated to handle Honolulu's solid waste? The Draft Hawaii 2000 Plan for Integrated Solid Waste Management states on Page 2-34 that Hawaii is a logical testing ground for these technologies for the following reasons:

- Disposal costs are relatively high
 - Energy prices are high
 - Counties, due to isolation as islands, have good control of waste flows
 - There is a strong need for new solutions
- Unlike large commercialized technologies, some emerging technologies are better at handling smaller waste streams and are favored by economics of scale.

Have you contacted the Hawaii Department of Health's Office of Solid Waste Management and the University of Hawaii to help you identify and evaluate alternatives? What was the outcome of these discussions?

Have you calculated the results of the diversion of solid waste from disposal through recycling and composting on O'ahu? How much of the waste stream would be diverted? How does that translate into time? With a serious effort, could the project be delayed another 5 or 10 years?

Life of the Land Comments on DSEIS for
Waimanalo Culch Sanitary Landfill Expansion
July 6, 2000
Page Four

Alternative 3: Alternative Locations. Life of the Land is concerned about Honolulu's solid waste management. Landfills are not a sustainable disposal strategy for a high percentage of the waste stream. What other options for waste processing have been explored? Please elaborate on the systems and technologies explored and the associated costs (economic, environmental, cultural, and social) of these alternatives.

Alternative 4: Proposed Expansion of the Existing Landfill. From our read of this document, it appears that this alternative was the ONLY alternative of interest to the developer. Chapter 343 states: "Examples of alternatives include:

- (1) The alternative of no action;
- (2) Alternatives requiring actions of a significantly different nature which would provide similar benefits with different environmental impacts;
- (3) Alternatives related to different designs or details of the proposed actions, which would present different environmental impacts;
- (4) The alternative of postponing action pending further study; and,
- (5) Alternative locations for the proposed project."

Litter:

The DSEIS states that: "Due to active coordination with the residents and businesses in the surrounding community, there have been only two complaints received since 1989, the inception of the landfill. These complaints were filed by passing motorists at the State Department of Health regarding litter control."

Life of the Land has been informed by many residents that paper and plastic shopping bags from the landfill are an almost constant problem in the area. We have been told that Ko Olina's Aloha Patrol picks up trash three times a week including that which flies from the landfill. At a community meeting, we heard that the plastic bags get caught in the trees making it very difficult to get to. Even though residents have said that when they call to report litter, the management of the landfill is very responsive, it is nevertheless, a problem for the community.

Therefore, though the DSEIS states that litter fences will continue to be installed, Life of the Land reminds you that this system has been inadequate to date. What measures will you take to insure, to the fullest extent possible, that litter from the landfill will be controlled?

Flying debris is an eyesore. Flying debris can cause a power outage. Please detail a plan addressing the flying debris from the landfill in the FSEIS.

How can you insure that flying debris will not end up along our precious coastlines?

How can the community be assured that litter from the landfill will not be contaminated with harmful toxins?

Life of the Land Comments on DSEIS for
Waimanalo Gulch Sanitary Landfill Expansion
July 6, 2000
Page Five

Scenic Resources:

We notice in the photographs provided in the DSEIS the caption "Existing Landfill Area To Be Revegetated". When will this happen? When one cell of the landfill is closed out, do you revegetate the area? Do your permit requirements call for this condition? Have you revegetated any part of the landfill to date?

Visual Impacts:

Viewplanes are becoming increasingly important to the people of O'ahu. Since the landfill's proposed expansion would take place both vertically and horizontally, how will the visual impacts be mitigated?

Responses to Comment Letters:

The Office of Environmental Quality Control asked: "What is the anticipated solid waste disposal amount from each of the affected years? How much additional capacity will be provided by this new project? Do the disposal projections match the proposed landfill capacity?"

Life of the Land hereby asks for a thorough responses to these questions.

Dust Control:

The DSEIS glosses over the issue of H-POWER's ash and the impacts on air quality, human health and the environment from flying ash. The ash material contains heavy metals, dioxin, and furans. What are your plans to mitigate this health hazard? Please outline your litter and dust control program in the Final Supplemental Environmental Impact Statement (FSEIS).

How will you keep the soil from grading activity from blowing all over surrounding communities?

Fire Hazard:

Your discussion of fire hazards is minimal. Has there ever been a fire at the Waimanalo Gulch Sanitary Landfill? What is your fire safety plan? How do you notify the community of the danger of fire? How are Hawaiian Electric and Hawaiian Telephone contacted in case of emergency? Please outline your safety plan for your employees and the surrounding community.

Life of the Land Comments on DSEIS for
Waimanalo Gulch Sanitary Landfill Expansion
July 6, 2000
Page Six

Maps:

Please include maps which show the surrounding residential areas as well as Ko Olina resort with appropriate indications to show their proximity to the current and proposed site in the FSEIS. The maps in the DSEIS were not very helpful.

Please add Life of the Land as a consulted party on this development and send up a copy of the Final Supplemental Environmental Impact Statement.

Traffic:

The community has expressed concerns about increased traffic, refuse trucks in their neighborhoods, and odors from trucks traversing their community to access Waimanalo Gulch Sanitary Landfill.

With the proposed expansion, how much extra traffic is to be realistically expected?

Even with the turn lane, do you anticipate traffic/trucks being backed up at the freeway exit? How will this be mitigated?

Drainage Impacts:

Life of the Land is glad that you will be employing the liner, but will there be increased drainage problems because of the change in shape with the proposed expansion? How will these issues be addressed?

Again, mahalo nui loa for this opportunity to review the DSEIS for the Waimanalo Gulch Sanitary Landfill. Please list Life of the Land as a consulted party and send us a copy of the Final Supplemental Environmental Impact Statement.

Sincerely,

Kat Brady
Assistant Executive Director

By Fax to: Department of Environmental Services - 527-6675
R.M. Towill Corporation - 842-1937
Office of Environmental Quality Control - 586-4186
Maeda Timson, Chair - Makalei/Kapolei/Honokai Hale NB - 525-7124
Ko Olina Community Association - 671-3640

DEPARTMENT OF ENVIRONMENTAL SERVICES

CITY AND COUNTY OF HONOLULU

180 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 527-5653 • Fax: (808) 527-4878



April 24, 2001

JEREMY HARRIS
MAYOR

Ms. Kat Brady
Assistant Executive Director
Life of the Land
76 North King Street, Suite 203
Honolulu, Hawaii 96817

Dear Ms. Brady:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your letter dated July 7, 2000, concerning the subject Draft SEIS. We offer the following in response:

1. Public Notification - Public notification of the project EIS Preparation Notice was initially provided in the Office of Environmental Quality Control (OEQC) publication, the Environmental Notice, on December 8, 1999. Since then, public notification was again provided for the project Draft SEIS in the Environmental Notice on May 23, 2000. In conjunction with both notices copies of both documents were provided to selected government agencies and members of the public. Based on public comments received, a Revised Draft SEIS will be prepared. In accordance with Chapter 343, HRS, we will again provide notice to all interested parties through OEQC. The public will again have the opportunity to comment within the 45-day public comment period.
2. Accepting Authority - The accepting authority for the EIS is the Mayor of the City and County of Honolulu.
3. Alternatives - a) An expanded investigation of potential alternatives to the current use of Waimanalo Gulch will be provided in the forthcoming Revised Draft SEIS; b) the City is prohibited from use of H-POWER ash for alternatives such as construction and building materials filler and binder by the State Department of Health, Office of Solid Waste Management; c) we concur there is a need to utilize new technologies which can assist with the reduction of solid waste requiring landfill disposal. Potential alternatives which have been considered by the City will be included in the forthcoming Revised Draft SEIS.

YES	KTS		
NO	MM		
DATE	INITIALS		
APR 30 2001			
TMC			

THOMAS E. STENBERGER, P.E.
DEPUTY DIRECTOR

IN REPLY REFER TO:
#E 01-050

Ms. Kat Brady
April 24, 2001
Page 2

4. Litter - The issue of windblown litter is being addressed by an aggressive program involving the use of fencing, work crews, and new equipment. Fencing designed to capture litter had been previously cleaned by use of hand tools. Work crews will be provided with new equipment, such as MagVac, which incorporates a vacuum device to speed in the pickup of litter. This equipment will be truck-mounted to also facilitate the removal of litter from off-site locations.

Additional measures are under consideration and include the prohibition of paper and lightweight plastics going to the landfill. Use of this measure, however, will require further study to determine feasibility.

Waimanalo Gulch Sanitary Landfill is not permitted to accept toxic and hazardous wastes.

5. Scenic Resources - Revegetation has already occurred on completed landfill cells. This consists of haole koa and other vegetation which is the same as found surrounding the landfill site. The practice of revegetating completed cells will continue until exhaustion of landfill space. Revegetation is a requirement during final closure of the landfill.

6. Visual Impacts - Visual impacts will be mitigated by use of a landscaping plan complementary to the natural topography, as much as practicable.

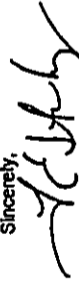
7. Anticipated Rate of Municipal Waste Generation - The proposed capacity of the landfill is approximately 9 million cubic yards at a fill rate of about 600,000 cubic yards per year, which will provide for an anticipated lifespan of 15 years. The current rate of disposal at Waimanalo Gulch is about 600,000 cubic yards annually. Over the timeframe of the proposed expansion there will be two major factors to consider: 1) new technologies to enable further reductions in waste requiring disposal are continually researched, evaluated, and implemented by the City (for example, the proposed In-Vessel Bioconversion Facility program which seeks to recycle sewage sludge and greenwaste); and 2) the rate of municipal waste generation has continued to increase.

8. Dust Control - Management of H-POWER ash and dust from excavation is an ongoing activity at Waimanalo Gulch. H-POWER ash is saturated when it leaves H-POWER. The bottom ash is processed through a water bath and the fly ash is wetted in a pug mill before loading into a haul truck. Onsite dust control during excavation is similarly practiced by judicious use of water misters and water trucks. During construction, dust screens may also be placed.

9. Fire Hazard - A copy of the fire safety plan is kept at the Waimanalo Gulch Sanitary Landfill administrative office. According to the fire safety plan, procedures to follow in the event of a fire include notification of the fire department by calling 911 and use of fire extinguisher equipment if the fire is small. Progressively heavier equipment is used if the fire is larger. Water trucks can be employed to spread water, and bulldozers may be used to break up and smother the fire with moist soil.
- An onsite emergency coordinator is tasked with overall fire control management and is responsible for carrying out specific actions during the event. This includes proper notification to authorities to advise the surrounding community of the fire.
10. Maps - Figures will be provided in the forthcoming Revised Draft SEIS identifying the residential subdivisions surrounding the site.
11. Traffic - As indicated in the project Traffic Assessment and Recommendations report, page 3, "The traffic volumes due to the proposed expansion of the landfill are not expected to be any different from existing volumes."
12. Drainage Impacts - The existing drainage control system is expected to continue to handle flows from throughout the 200-acre property. Because both the existing 86.5-acre site and the 60.5-acre expansion area are well within the drainage tributary, no major new drainage control structures are expected to be required.

We appreciate this opportunity to respond. Should you have any further comments please contact Ms. Wilma Namunnart of our office at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (extension 22).

Sincerely,



TIMOTHY E. STEINBERGER
Deputy Director

Enclosure

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation



University of Hawai'i at Mānoa

Environmental Center
A Unit of Water Resources Research Center
2550 Campus Road • Crawford 317 • Honolulu, Hawaii 96822
Telephone: (808) 956-7361 • Facsimile: (808) 956-3189

Ms. Wilma Namumart
Department of Environmental Services
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Ms. Namumart:

Waimanalo Gulch Sanitary Landfill Expansion
Draft Supplemental Environmental Impact Statement
Ewa, Oahu

The Department of Environmental Services proposes the 60.5-acre expansion of the existing 64.5-acre Waimanalo Gulch Sanitary Landfill. The purpose of the project is to accommodate Oahu's refuse disposal needs, which is expected to fill the existing landfill to capacity by 2002.

This review was conducted with the assistance of Chittaranjan Ray, Civil Engineering, and Sherril Hiraoka, Environmental Center.

General Comments

We are pleased that the Environmental Impact Statement (EIS) was well done, and covered some of the potential impacts and mitigative measures completely. In particular, we appreciate the Department of Environmental Services' efforts to recognize the unique waste disposal situation in the state and to identify methods of waste stream reduction. The programs outlined in the EIS demonstrate a positive effort to reduce our dependence on landfills. Despite this, we also recognize that more can be done to reduce waste generation, thus increasing the life span of the landfill. To ensure that all potential impacts of this development are addressed, we suggest that the issues discussed below be addressed in the Final Supplemental EIS.

An Equal Opportunity/Affirmative Action Institution

Ms. Namumart
July 7, 2000
Page 2

Litter Control

Litter control is cited as a problem in several parts of the draft SEIS, notably on page 1-14 and pages 3-16 to 3-17. Windblown litter seems to be a major concern of area residents. The placing of fences around the perimeters of active cells should help to address this problem but are there other methods that might be considered? For example, spraying pick-up trucks with water as they enter, or requiring that all open bed vehicles have a net placed over the waste they are hauling may be helpful.

Alternatives Considered

We are rather surprised that the recycling efforts thus far have not yielded a significant reduction in waste loads to landfills. We are curious to know if there has been a gradual decrease in municipal solid waste (MSW) entering the Waimanalo Gulch Landfill, as well as other landfills. A reduced expansion of the landfill space to last an approximate 10-year life span at the current rate of waste generation may be appropriate. This may be a tool in inspiring the City (as well as the State) to explore mandated programs for waste reduction. For example, Minneapolis bans the use of Styrofoam containers in grocery store meat departments. Is it possible for Honolulu to develop similar ideas to promote reusable products? Such an effort to reduce waste load may extend the overall life of the landfill by 5 or 10 years.

Surface Water

The location of the drainage way mentioned within the landfill property (page 3-6) is not identified. A map of the drainage way with respect to the operation areas would be helpful in determining the impacts of the project. We also suggest that the final document include whether or not the retention basin will hold all water and runoff within the landfill site.

The EIS would benefit from a more detailed description of the daily cover for the MSW and of the steps that will be taken to prevent infiltration of precipitation into the waste. Are the existing leachate collection systems functional? If so, what are the estimated daily and monthly volumes of leachate collected?

Traffic and Roadways

While the discussion on traffic (page 4-2) indicates that "the intersection of Farrington Highway and the landfill access road operate at acceptable conditions," a letter from the Department of Health dated February 4, 2000 (Chapter 11, Comments and Responses to the Preparation Notice), suggests that refuse trucks back up onto Farrington Highway when the H-Power facility is shut down. During these times, "all H-Power waste traffic is diverted to the Waimanalo Gulch Landfill." What is the effect of these back ups on the flow of traffic on Farrington Highway? Would it be possible to create a "holding area" for these trucks while they are waiting to deliver their loads?

Ms. Namum.
July 7, 2000
Page 3

Our reviewers also note that the number of vehicles using Farrington Highway at Kahe point will nearly double according to the Oahu Regional Transportation Plan but no date or time frame is mentioned. What is the time frame of the plan, and when will the predicted increase reach the 70,000 vehicles a day? It also seems strange that the peak volume will increase only 45 percent, from 2000 vehicles/hour to 2880 vehicles/hour, during the same period. If the total number does increase to 70,000, this will be an average of 2916 vehicles per hour, which is higher than the predicted peak volume.

Community Involvement

We note that in a recent Star Bulletin article dated June 29, 2000, the Makakilo/Kapolei Neighborhood Board states that the City had agreed in 1984 not to expand the landfill. Did the City in fact agree to this limitation? If so, then more intensive community planning seems to be in order, especially considering the opposition expressed by the Makakilo/Kapolei Neighborhood Board.

Landfill Closure and Monitoring

The closure of the landfill is discussed on page 2-5 to 2-6. It is stated in this section that monitoring for gas and leachate will continue as required after the closure. How will this monitoring be done, who will conduct the monitoring, and how long will the monitoring continue?

Conclusion

While we recognize the need for additional landfill space, we suggest an expansion of reduced magnitude, coupled with a more aggressive waste reduction campaign as an alternative to the proposed project. In addition to this, more detailed information regarding the handling of surface water/leachate, and a response to the Makakilo/Kapolei Community Board's statements would be helpful in making appropriate assessments of the full impact of this landfill expansion.

Thank you for the opportunity to comment on this Draft Supplemental Environmental Impact Statement.

Sincerely,


Peter Reppas
Assistant Environmental Coordinator

cc: Randall Fujiki, Department of Planning and Permitting
Brian Takeda, R.M. Towill Corporation, Inc.
OEQC
James Moncur, WRRRC
Chittaranjan Roy, Civil Engineering
Sherri Hiraoka, Environmental Center

DEPARTMENT OF ENVIRONMENTAL SERVICES
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 Phone: (808) 527-4863 • Fax: (808) 527-9875

Mr. Peter Rappa
 April 30, 2001
 Page 2



JEREMY HARRIS
 Director

WES	KTS	TRACY E. STEINBERGER, P.E. CHIEF DIRECTOR
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BRT	BRT	
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REPLY REFER TO: RE 01-043		

April 30, 2001

Mr. Peter Rappa
 Assistant Environmental Coordinator
 Environmental Center
 University of Hawaii at Manoa
 2550 Campus Road, Crawford 317
 Honolulu, Hawaii 96822

Dear Mr. Rappa:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your letter dated July 7, 2000, concerning the subject Draft SEIS. We offer the following comments in response:

1. Litter Control - We acknowledge that the issue of litter is of major concern to area residents. Actions to address this concern include the use of fencing, work crews, and new equipment. Fencing designed to capture windblown litter had been previously cleaned by use of hand tools. Work crews will be provided with new equipment, such as MadVac, which incorporates a vacuum device to speed in the pickup of litter. This equipment will be truck-mounted to facilitate the removal of litter from off-site locations.
 ENVY has advised refuse trucking firms to ensure that loads are properly covered prior to delivery to the landfill. Commercial and City refuse vehicles leaving the landfill are also being inspected to ensure they have thoroughly cleaned out their vehicle beds and/or resecured their covers.
 Additional measures are under consideration and include the prohibition of paper and lightweight plastics going to the landfill. Use of this measure, however, will require further study to determine feasibility.

2. Alternatives Considered - We concur there is a need to utilize new technologies which can assist with the reduction of solid waste requiring landfill disposal. Alternatives which have been considered by the City will be included in the forthcoming Revised Draft SEIS.
3. Surface Water - The following items will be provided in the forthcoming Revised Draft SEIS: 1) location of the drainageway; 2) design capacity of the retention basin; and 3) detailed description of leachate collection system and ground cover activities. The existing leachate collection system is fully operational.
4. Traffic and Roadways - Waste Management of Hawaii has instituted new procedures for refuse truck deliveries. Previously, the queuing of refuse trucks onto Farrington Highway was due to: 1) refuse trucks lining up while waiting for the landfill to open for business; and 2) increased queuing of refuse trucks during H-POWER shutdowns. The new procedures involve:
 - Permitting refuse trucks to queue inside the front gate before the start of the business day. This moves refuse vehicles off Farrington Highway, while allowing early arriving vehicles a place to wait prior to the opening of the landfill.
 - City refuse vehicles which regularly use the landfill during H-POWER shutdowns can be pre-weighted. This practice allows those vehicles to bypass the weigh station, which reduces vehicle queuing.

We expect the landfill expansion to extend operations to the year 2017. Although the Oahu Regional Transportation Plan identifies projected traffic volumes, actual yearly traffic volumes will need to be regularly reviewed by DOT for safety and sufficiency of service. As indicated in the traffic assessment, although the installation of a traffic signal is a potential mitigation measure which can decrease future delay conditions, minor street volumes would likely not meet the minimum volumes needed to satisfy any of the volume warrants for traffic signals.

Mr. Peter Rappa
April 30, 2001
Page 3

5. Community Involvement - The City has been unable to confirm the existence of a 1984 agreement that the landfill would not be expanded. The siting of a landfill is understandably difficult as the current land use, the federal regulations, Board of Water Supply's "Pass/No Pass" and the Underground Injection Control (UIC) severely limit locations for the siting of such a facility. The City is continuing to work with the surrounding communities of Ko Olina, Kapolei, Honokai Hale, and Waianae in efforts to address or provide answers to stated concerns.
6. Landfill Closure and Monitoring - Monitoring of the site will be the responsibility of Waste Management of Hawaii. This will include collection and sampling of landfill associated gasses and leachate for a period of 30 years.

We appreciate your constructive review of the Draft SEIS. Should you have any further comments please contact Ms. Wilma Namumant of our office at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 688-2985 (ext. 22).

Sincerely,



TIMOTHY E. STEINBERGER
Acting Director

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation

COPY

DK	KVS		
WES	NM		
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The Fairways

Ko Olina Resort

July 6, 2000

Department of Environmental Services
City & County of Honolulu
650 South King Street, 3rd floor
Honolulu, Hawaii 96813

RE: Objection to the Expansion of the Waimanalo Gulch Landfill
And Brief Comments to the Draft Supplemental Environmental Impact Statement
(SEIS) For the Waimanalo Sanitary Landfill Expansion, dated April 2000.

Ladies and Gentlemen:

I am writing to you as president of the Association of Apartment Owners (AOAO) at the Fairways at Ko Olina Resort. I am writing to you on behalf of a majority of our homeowners, to express our objection to the proposed expansion of the Landfill and to urge you to consider carefully and fully the negative impact that the proposed Landfill expansion would have on developing areas such as Ko Olina Resort and the second city of Kapolei.

The AOAO of the Fairways at Ko Olina Resort was not consulted in the preparation of the SEIS. We actively sought out a copy of the report for our review and we obtained it just a few days ago. We know that odors are emitted from the landfill, we have seen smoke from apparent fires in the landfill, and we have witnessed the trash left by trucks leaving the landfill that use the highway winds to clean out the back of the truck. Accordingly, Farrington Highway near Ko Olina Resort and Honokai Hale is covered with litter within a couple of miles of the landfill site. Extraordinary community efforts constantly are clearing litter in the area. In a brief reading of the SEIS it looks incomplete in the following areas; alternative site evaluation, impact on existing and planned communities and visual impact of the site. We have reviewed a letter dated June 29, 2000 to the Department of Environmental Services from the Ko Olina Community Association and we support and agree with their detailed comments and objections.

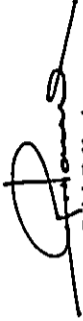
As you know, homeowners at the Fairways (280 townhomes) invested in a lifestyle on this private resort property. Many of us knew that the term of the Landfill was to end in a couple of years and this made "common sense" to buyers that the future would not include a Landfill across Farrington Highway.

Since the City & County of Honolulu and the State of Hawaii were both encouraging development on the southwestern section of the island our investments in homes on a private resort made sense. Someone even coined the concept of the "Second City at Kapolei."

Please note our objection to an expansion of the Waimanalo Gulch Landfill. To entertain an extension of the Waimanalo Gulch Landfill now defies common sense, exacerbates years of planning, and sends the wrong message to homeowners and investors in our communities.

Please call anytime at (808) 679-0085.

Sincerely,



Ralph F. Harris
President AOAO
Ko Olina Fairways
92-1527 H Alinui Drive
Ko Olina Resort, HI 96707

cc: Council Member John DeSoto, Via Fax: (808) 523-4220
Office of Environmental Quality and Control (OEQC)
Ko Olina Community Association (KOCA)
R. M. Towill Corporation

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

820 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 521-4800 • Fax: (808) 527-8675



JEREMY HARRIS
MAYOR

TRUDY E. STENBERGER, P.E.
DEPUTY DIRECTOR
INTEREST REFER TO:
1601-1047

Mr. Ralph F. Harris
April 24, 2001
Page 2

April 24, 2001

Mr. Ralph F. Harris, President
Association of Apartment Owners
The Fairways, Ko Olina Resort
92-1527 H Alinui Drive
Ko Olina Resort, Hawaii 96707

Dear Mr. Harris:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your letter dated July 6, 2000, concerning the subject Draft SEIS. We offer the following in response:

OBJECTION TO PROPOSED EXPANSION PROJECT

We acknowledge your objection to the proposed expansion of the Waimanalo Gulch Sanitary Landfill. The City and County of Honolulu remains committed to working with area residents and the community to address stated concerns and issues to reduce and minimize the potential for impacts. This is part of the reason why the City has decided to revise the previous Draft SEIS and to publish a forthcoming Revised Draft SEIS. Public notification of availability of this document will be provided through the Office of Environmental Quality Control (OEQC), Environmental Notice. Copies of the Revised Draft SEIS will be available for review from OEQC and area libraries.

ACTIONS TO ADDRESS POTENTIAL IMPACTS ASSOCIATED WITH OPERATION OF THE PROPOSED SANITARY LANDFILL EXPANSION

ODORS - We can verify that incidences of odor tend to increase whenever there is a shutdown of H-POWER. Whenever H-POWER is down, waste which would ordinarily be incinerated must be diverted to the landfill. Refuse trucks, which could constitute a part of the odor source, are managed by the various hauling companies, with oversight by the Department of Environmental Services (ENV). ENV and Waste Management of Hawaii are aware of this situation and are addressing this problem.

1. New odor neutralizing solvents and deployment systems, such as manufactured by Benzaco Scientific, Inc., are being applied onsite to reduce or eliminate odors. The type of odor neutralizers that are used are state-of-the-art and have been successfully used elsewhere by Waste Management.

2. The key to managing the odor problem is to deploy the neutralizers prior to and during periods when it is expected that diverted municipal solid waste from H-POWER will be received. We anticipate that fine tuning of this equipment will be necessary to optimize the reduction of odors.

3. The system in place uses a series of spray misters. Waste Management will make adjustments as necessary in the location of these systems to ensure off-loading trucks and the refuse itself are properly treated.

4. As soon as possible cover material is placed over the refuse to further suppress odors.

Sewage sludge, which is disposed of at the landfill, has also been identified as a potential odor source. Sewage sludge is normally heat-treated at the treatment plant prior to being loaded onto trucks for delivery to the landfill. Under normal circumstances the heat treatment, loading, and delivery procedures ensure against generation of objectionable odors. However, as with H-POWER, there are some periods when the heat treatment equipment requires regularly scheduled maintenance. We will review our procedures for sludge disposal during these periods and increase use of odor treatment systems. The Sand Island Wastewater Treatment Plant (SIWWTP), our largest source of sewage sludge, is in the process of initiating new upgrades to improve overall handling and treatment of both liquid and solid waste streams. We expect that the combination of using new odor treatment systems and improved solid waste handling at SIWWTP will markedly improve our ability to control odors.

LITTER ALONG HIGHWAYS - We acknowledge your concern regarding litter. Remedial actions include the use of additional fencing, work crews, and new equipment. Fencing designed to capture windblown litter had been previously cleaned by use of hand tools. Work crews will be provided with new equipment, such as MadVac, which incorporates a vacuum device to speed the pickup of litter. This equipment will be truck-mounted to facilitate the removal of litter from off-site locations.

ENV has advised with refuse trucking firms about the importance of ensuring that refuse loads are properly covered prior to making deliveries to the landfill. Commercial and City refuse vehicles leaving the landfill are also being inspected to ensure they have thoroughly cleaned out their vehicle beds and/or have resecured their covers.

Mr. Ralph F. Harris
April 24, 2001
Page 3

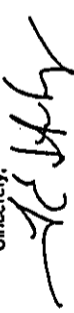
Additional measures are under consideration and include the potential for removal of paper and lightweight plastics going to the landfill. Implementation of this measure, however, will require further study to determine feasibility.

DISPOSAL ALTERNATIVES CONSIDERED - The forthcoming Revised Draft SEIS will include additional information about ongoing efforts to assess both technical alternatives and new landfill siting alternatives to the proposed expansion of Waimanalo Gulch.

IMPACT ON EXISTING AND PROPOSED COMMUNITY DEVELOPMENT - Under ideal circumstances, a sanitary landfill would be sited in a location with no potential for impacts to the natural environment or community. Unfortunately, the continuing urbanization of Oahu, combined with stringent State and Federal environmental regulations, makes the siting of any landfill a difficult undertaking for all involved. The proposed expansion of Waimanalo Gulch is based on thorough review and assessment of a number of potential alternatives, including both new waste reduction technologies and over 40 potential landfill sites throughout Oahu. We have heard community concerns and issues and are willing to implement practices and procedures, as needed, to reduce, minimize, or if possible eliminate, the potential for impacts.

We appreciate your review of the Draft SEIS. While we understand your objection to the proposed project, we hope that you will continue to offer your constructive comments so that we can improve our landfill operation. Any further comments may be directed to Ms. Wilma Namumart of our office at 527-5358 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 688-2985 (extension 22).

Sincerely,



TIMOTHY E. STEINBERGER
Deputy Director

Enclosure

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pacific Islands Ecoregion
300 Ala Moana Blvd, Rm 3-122
Box 50088
Honolulu, HI 96850

In Reply Refer To: JAK

Ms. Wilma Namumart
Department of Environmental Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, HI 96813

JUL 6 2000

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Re: Draft Supplemental Environmental Impact Statement (SEIS) for Waimanalo Gulch Sanitary Landfill Expansion, Oahu, Hawaii

Dear Ms. Namumart:

The U.S. Fish and Wildlife Service (Service) has reviewed the Draft SEIS for the proposed expansion of the Waimanalo Gulch Sanitary Landfill, Oahu, Hawaii. The project sponsor is the City and County of Honolulu, Department of Environmental Services. The landfill is operated on behalf of the City and County by Waste Management Hawaii, Inc. The proposed project involves increasing the current landfill capacity by 60.5 acres, thereby expanding the existing landfill footprint to 147 acres within the 200-acre landfill site. Construction activities include clearing and grubbing of rocks and vegetation, excavating and stockpiling of up to 1.2 million cubic yards of soil, installation of a liner system, and grading and revegetation of the existing landfill area upon closure. The Service offers the following comments for your consideration.

Based on our review of the information provided in the Draft SEIS and in our files, there are no federally endangered, threatened, or candidate species, or other Federal trust resources, within the landfill site. The SEIS addresses potential impacts to Federal trust resources and adequately identifies measures to avoid or minimize impacts to these resources. Since native plant species may be removed during clearing, we recommend using native plants characteristic of the surrounding area for revegetation upon closure of landfill areas.

If you have questions regarding these comments, please contact Fish and Wildlife Biologist James Kwon by telephone at (808) 541-3441 or by facsimile transmission at (808) 541-3470.

Sincerely,

Paul Henson
Paul Henson
Field Supervisor
Ecological Services

cc: Randall Fujiki, C&C of Honolulu
Brian Takeda, R.M. Towill

JEFFREY HARRIS
MANAGER



CITY AND COUNTY OF HONOLULU

DEPARTMENT OF ENVIRONMENTAL SERVICES
650 SOUTH KING STREET, HONOLULU, HAWAII 96813
PHONE: (808) 527-4853 • FAX: (808) 527-4875

YES	KTS	ACTING DIRECTOR
NO	NO	
REC'D	MAY 18 2001	DMTC

May 14, 2001

Mr. Paul Henson
Field Supervisor, Ecological Services
Pacific Islands Ecoregion
Fish and Wildlife Service
U.S. Department of the Interior
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawaii 96850

Dear Mr. Henson:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your comments dated July 6, 2000, concerning the subject Draft SEIS. We acknowledge your concurrence that there are no federally endangered, threatened, or candidate species, or other Federal Trust resources within the landfill site. Your recommendation for the use of native plant species for revegetation has been forwarded to Waste Management of Hawaii, Inc., who will handle the landfill closure.

We appreciate your review of the Draft SEIS. Should you have any further comments, please contact Ms. Wilma Namumart of our office at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (extension 22).

Sincerely,

Timothy E. Steinberger
TIMOTHY E. STEINBERGER
Acting Director

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation

July 6, 2000

Kenneth Sprague, Director
Department of Environmental Services
City & County of Honolulu
650 So. King St., 3rd Floor
Honolulu, Hawaii 96813

Re: Waimanalo Gulch Sanitary Landfill Expansion

Dear Dr. Sprague: *Ken*

The Community of Honokai Hale/Nanakai Gardens strongly opposes the planned expansion of this landfill for many reasons:

1. The Supplemental EIS (SEIS) fails to address the current situation in this area, which has greatly changed since the original EIS of 1984. Now, directly across from this landfill is the major expanding Ko Olina Resort with its 150 foot high Ihilani Hotel, a residential community called the Fairways, and plans for the construction of hundreds more residential dwellings including single family homes, duplexes, town houses and time share units.

Also, of great personal concern to our community of Honokai Hale/Nanakai Gardens (which is not even shown on your maps, though it did exist in 1984) is the fact that the expansion of the Waimanalo Landfill will bring it even closer to our homes with all of its accompanying odor, dust and vermin problems.

2. The SEIS states that the odor, dust and litter problems will be mitigated, however, they have not been satisfactorily dealt with since the landfill's beginning. How will the landfill's expansion change anything?

Our community is sick and tired of having to look at the litter along Farrington Highway and HI as we travel to and from points East, litter which blows out of the refuse trucks on their way to the landfill, and even worse on their way back.

And what a miserable sight for visitors, tourists and residents of Ko Olina to see all that litter which can only possibly be surpassed by odors as they approach the landfill, and perhaps worst of all, the sight of it from the hotel's higher floors.

This whole expansion plan can seriously affect the positive economic effect the Resort can have on our Island and State economy.

3. The SEIS also does not clearly address the concerns our community has always had

about leachates and their possible effects on the ground water in the area which, though it may be somewhat brackish, is still usable for irrigation. Also, we have concerns about leachate which may be carried downhill towards residences and the ocean during periods of rainfall or storms.

4. The SEIS is very skimpy in its addressing of alternative landfill locations. All possible sites, which are away from residential, resort, or other populated areas should be thoroughly explored and not lightly dismissed as more expensive to get to or to operate.

Refuse comes from all of Oahu, and all of Oahu should pay the price, even if it means beginning to charge for refuse pick up and disposal.

Furthermore, what about other alternatives to landfills? They are out there - clean, efficient, able to handle even hazardous and medical waste, often with no by products, or safe by products which can be used for construction purposes like making tiles or road construction materials. Kauai is looking at some of these right now. Why isn't the City and County of Honolulu?

The time has come to end the disposal of waste by burning and landfills and to step forward to the future by planning to use modern, environmentally sound technology instead.

5. Finally, our community never received the SEIS and learned of it from others who also should have received one, but had to ask for it to obtain one.

Please do not neglect us in the future.

Sincerely,

Jane A. Ross

Jane A. Ross
Corresponding Secretary for
Kuuilei Jojoniho, President

P.S. Future correspondence can be sent to the association at the following address:
92-783 Laaloa Place
Kapolei, HI. 96707

cc: Mayor Jeremy Harris
Councilmember John DeSoto
Senator Colleen Hanabusa
Representative Mike Kahikina
Dept. of Environmental Quality Control
R.M. Towill, Corp.

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 527-6643 • Fax: (808) 527-6875



JEREMY HARRIS
MAYOR

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR
SABRY FUCUNAGA
DEPUTY DIRECTOR
IN REPLY REFER TO:
RE 00-103

August 31, 2000

Ms. Jane A. Ross
92-783 Laaloa Place
Kapolei, Hawaii 96707

Dear Ms. Ross:

Thank you for your comments to Mayor Jeremy Harris expressing your opposition to the planned expansion of the Waimanalo Gulch Sanitary Landfill. I have confirmed that the consultant has received a copy of your letter and that your concerns will be addressed in the Final Supplemental Environmental Impact Statement. I am sorry you did not receive a copy of the draft. The consultant indicated that copies were sent to the neighborhood board chairs and to the Waianae Public Library, as required by the Office of Environmental Quality Control. We will send a copy of the Final Supplemental Environmental Impact Statement to you when it is issued.

Should there be any questions, please call Wilma Namumnat of the Refuse Division at 527-5378.

Sincerely,

KENNETH E. SPRAGUE
Director

cc: Office of the Mayor (Control No. 2718)
R. M. Towill

bcc: ENV-Refuse Division

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

640 SOUTH KING STREET, HONOLULU, HAWAII 96819
Phone: (808) 521-5003 • Fax: (808) 521-5004



REC'D	REC'D	REC'D	REC'D
RF	Y-L	MM	KTS
RT	RT	BRT	
REC'D MAY 21 2001			
MTC			
TIMOTHY E. STAMBERGER, P.E.			
CITY ENGINEER			
REPLY REFER TO:			
RE: 01-071			

May 16, 2001

Ms. Jane A. Ross
May 16, 2001
Page 2

Ms. Jane A. Ross
Corresponding Secretary for
Kuulei Jolonino, President
92-783 Laaloa Place
Kapolei, Hawaii 96707

Dear Ms. Ross:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your comments dated July 6, 2000, concerning the subject Draft SEIS. We offer the following itemized response to your comments:

1. a. Changed Conditions at Ko Olina/Honokai Hale/Nanakai Gardens - We acknowledge that since completion of the 1984 Leeward District Sanitary Landfill EIS there have been significant changes in the region. A detailed description of the current area population, including subdivision projects, will be provided in the forthcoming Revised Draft SEIS.
- b. Location of Proposed Landfill Expansion Area - The Draft SEIS indicates that the proposed Waimanalo Gulch Sanitary Landfill Expansion project will be entirely contained within the existing 200-acre property owned by the City and County of Honolulu. Therefore, the proposed landfill site will not be moving closer to existing residences in the area.
2. a. Odor and Dust Concerns - We acknowledge your concerns regarding odor, dust, and litter associated with operations of the Waimanalo Gulch Sanitary Landfill. We have verified that complaints such as you describe tend to increase whenever H-POWER is shut down for periodic maintenance. During these periods waste which would ordinarily be incinerated is diverted to the landfill site. The Department of Environmental Services and Waste Management of Hawaii, operator of the landfill are addressing these problems through the following measures:

- 1). New odor-neutralizing solvents and deployment systems, such as manufactured by Benzaco Scientific, Inc., are being applied onsite to reduce or eliminate odors. The odor neutralizers used are state-of-the-art and have been successfully used elsewhere in the nation by Waste Management.
- 2). The key to managing odor is to deploy the neutralizers prior to and during periods when municipal solid waste is diverted from H-POWER. We anticipate that fine-tuning of this equipment will be necessary to optimize the reduction of odors.
- 3). The system uses a series of portable spray misters. Waste Management will make adjustments as necessary in the location of these misters to ensure off-loading trucks and the refuse itself are properly treated.
- 4). As soon as possible, cover material is placed over the refuse to further suppress odors which could be generated within the landfill.

Sewage sludge has also been identified as a potential odor source. Under normal circumstances, heat treatment, loading, and delivery procedures ensure against generation of objectionable odors. However, as with H-POWER, there are some periods when heat treatment equipment will require regularly scheduled maintenance. We will monitor our procedures during these periods and increase use of odor treatment systems as necessary. Sand Island Wastewater Treatment Plant (SIWWTP), our largest source of sewage sludge, is installing upgrades to improve overall handling and treatment of both liquid and solid waste streams. We expect that the combination of using new odor treatment systems and improved solid waste handling at SIWWTP will markedly improve our ability to control odors.

- b. Litter Along Highways - We are addressing litter with additional fencing, work crews, and new equipment. Fencing designed to capture windblown litter had been cleaned with hand tools. Workcrews will be provided with new equipment, such as MadVac, which incorporates a vacuum device to speed litter removal. This equipment will be truck-mounted to facilitate the removal of litter from off-site locations.

We have reminded refuse trucking firms of the importance of covering their vehicles. Commercial and City refuse vehicles entering or leaving the landfill are also being monitored to ensure they have covers in place.

Additional measures to the above are under consideration and include the potential for removal of paper and lightweight plastics going to the landfill. Use of this measure, however, will require further study to determine feasibility.

c. Vector Concerns - The Waimanalo Gulch Sanitary Landfill is regulated by the State Department of Health, which regularly inspects the facility to ensure against vector problems. To date, we are not aware of any vector problems associated with operations of the landfill.

d. Impact to Resort and Area Residences - Under ideal circumstances, a sanitary landfill would be sited in a location with no potential for impacts to the natural environment or community. Realistically, ongoing urbanization on Oahu, combined with stringent State and Federal environmental regulations, makes the siting of any landfill a difficult undertaking for all involved. The proposed expansion of Waimanalo Gulch is based on thorough review and assessment of a number of alternatives, including new waste reduction technologies and over 40 potential landfill sites throughout Oahu. We have been able to obtain some information on community concerns and issues and are willing to implement practices and procedures, as needed, to reduce, minimize, or if possible, eliminate, the potential for impacts.

3. Potential for Impacts Due to Generation of Leachate - The Waimanalo Gulch Sanitary Landfill has an existing leachate collection system, which has been designed to standards of the Federal Environmental Protection Agency (EPA) and State Department of Health. According to the Draft SEIS, four preventative measures are in place to prevent and mitigate the potential for leachate migration into ground and surface water: 1) a surface drainage system; 2) a sanitary landfill liner system; 3) a leachate collection system; and 4) use of final cover and grades.

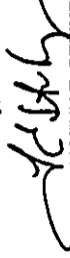
To date, the existing system has successfully operated in accordance with Federal and State requirements for protection of surface and ground water. Waste Management of Hawaii will continue to properly maintain and operate this system to ensure against adverse impacts to our surface (inland and coastal) and ground water (potable, as well as non-potable) resources.

4. Alternatives Analysis - The forthcoming Revised Draft SEIS will include additional information on efforts we have been making to assess both technical and new landfill siting alternatives to the proposed expansion of Waimanalo Gulch.

5. Public Notification of Revised Draft SEIS - Public notification of availability of the Revised Draft SEIS will be provided in the Office of Environmental Quality Control (OEQC) Environmental Notice. Copies of the Revised Draft SEIS will be available for review from OEQC and area libraries. We will also be providing a copy of this document to the Kapolei/Makakilo/Honokai Hale Neighborhood Board.

We appreciate your review of the Draft SEIS. Should you have any further comments, please contact Ms. Wilma Namumart of our office at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (extension 22).

Sincerely,



TIMOTHY E. STEINBERGER
Acting Director

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation

July 5, 2000

BROOKFIELD
H O M E S

R.M. Towill Corporation
420 Waikamilo Road, Suite 411
Honolulu, HI 96817-4941

RE: Waimanalo Gulch Sanitary Landfill

To Whom it May Concern:

We are a residential homebuilder who has recently acquired over 700 homesites in the Ko Olina master plan. The above mentioned issue has been brought to our attention and we wanted to raise the following concerns:

Adjacent and Surrounding Uses. The location map (Figure 1-2) does not identify the Ko Olina Resort area, show major existing thoroughfares, and current geographical configurations of the Ko Olina lagoons. On this and other maps, more specific developments and proximity to the landfill site should be indicated clearly. In particular, existing residential developments such as the nearby agricultural lots, planned low-density residential developments on the Ko Olina Resort, and the Honokai Hale area should be clearly depicted graphically.

Proximity to surrounding land uses. The EIS states that the Ko Olina Golf Course and Ihilani Resort are one to two miles to the southeast. The Ko Olina Resort property is in fact about 500 feet from the landfill site. New low-density residential units are being constructed as close as 1000 feet directly downwind from the landfill site and only 200 feet from the landfill entrance road. The EIS should reflect this proximity and address associated impacts. We are particularly concerned about the expansion to the immediate east of the existing landfill, which will bring the landfill operations close to the highway and residential developments.

Airborne impacts: The EIS states that impacts such as odor, dust and litter will be mitigated through various means, however, past experience has shown that these impacts are not addressed on a daily basis. Ko Olina Resort and other surrounding landowners have experienced problems with these impacts. Refuse trucks enroute to the landfill have often dropped litter along Farrington Highway. During certain times, odors from the landfill can be detected on the Ko Olina Golf Course, Ihilani Resort, Lanikuhana, Paradise Cove, and the guard shack. Plastic bags blown from the landfill litter the resort site and nearshore areas; this is a persistent major problem. New residences consisting of single-family residential units in structures up to 30 feet high will be constructed near the highway interchange and will be even closer to the landfill and more sensitive

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to the odors, dust and noise generated at the landfill. The EIS should be amended to reflect these problems and indicate mitigation measures to address these concerns in the future. Alternative Locations. The EIS devotes less than one page to a discussion of alternative locations. Per content requirements of Section 11-200-17 (f), Hawaii Administrative Rules:

"The draft EIS shall describe in a separate and distinct section alternatives which could attain the objectives of the action, regardless of cost. In sufficient detail to explain why they were rejected. The section shall include a rigorous exploration and objective evaluation of the environmental impacts of all such alternative actions. Particular attention shall be given to alternatives that might enhance environmental quality or avoid, reduce or minimize some or all of the adverse environmental effects, costs, and risks... In each case, the analysis shall be sufficiently detailed to allow the comparative evaluation of the environmental benefits, costs, and risks of the proposed action and each reasonable alternative." (emphasis added)

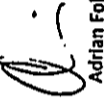
We fail to see any such discussion. Use of closed landfills or Federal lands in current use or over ground-water areas do not seem to qualify as reasonable alternatives. We would suggest that the 1984 EIS (Table 6-1) and the 1995 Solid Waste Integrated Management Plan be used as starting points. We would also like to see alternatives such as use of only the rear portion of the existing landfill site be explored.

We are extremely concerned with the landfill operations and the negative effect it has on the surrounding area. We strongly urge you to consider our points and act upon them on our behalf. We are available to discuss this and other matters at any time.

We thank you for your time and assistance.

Sincerely,

BROOKFIELD HOMES HAWAII INC.



Adrian Foley

Senior Vice President of Development

cc: Jeffrey Prostor President, Brookfield Homes
Jeff Brown TeamBuild Management Services
Kenneth Williams Ko Olina Community Association

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

810 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 527-4800 • Fax: (808) 527-4875



JEREMY HARRIS
MAYOR

TIMOTHY E. STENSONGER, P.E.
ACTING DIRECTOR
MEMO REFERENCE NO.
HE 01-002

May 25, 2001

Mr. Adrian Foley
Senior Vice President of Development
Brookfield Homes
Southland Business Group
3090 Bristol Street, Suite 200
Costa Mesa, California 92626-3061

Dear Mr. Foley:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your comments dated July 5, 2000, concerning the subject Draft SEIS. We offer the following itemized response to your comments:

1. **Adjacent and Surrounding Uses - Additional information concerning developments close to the Waimanalo Gulch Sanitary Landfill will be provided in the forthcoming Revised Draft SEIS.**
2. **Proximity to Surrounding Land Uses - We acknowledge the location of the Olin property is close to the entrance of the landfill site on Farrington Highway. However, landfill operations will continue to be contained entirely within the 200-acre Waimanalo Gulch landfill site owned by the City and County of Honolulu. Both ENV and Waste Management of Hawaii, Inc., are actively working to address many of the issues you describe involving odor, litter, and potential visual impacts.**

Odors - Odor and litter issues tend to increase whenever H-POWER is shut down for periodic maintenance. During these periods, waste which would ordinarily be incinerated is diverted to the landfill site. The following measures have been implemented to address this concern:

A. New odor neutralizing solvents and deployment systems, such as manufactured by Benzaco Scientific, Inc., are being applied onsite to reduce or eliminate odors. These odor neutralizers are state-of-the-art and have been successfully used elsewhere by Waste Management of Hawaii.

Mr. Adrian Foley
May 25, 2001
Page 2

- B. The key to managing the odor problem is to deploy the neutralizers prior to and during periods when municipal solid waste is diverted from H-POWER. We anticipate that fine-tuning of this equipment will be necessary to optimize the reduction of odors.
- C. The system in place uses a series of spray misters. Waste Management will make adjustments as necessary in the location of these misters to ensure off-loading trucks and the refuse itself are properly treated.
- D. As soon as possible, cover material must be placed over the refuse to further suppress odors.

Sewage sludge which is disposed of at the landfill has also been identified as a potential odor source. Sewage sludge is normally heat treated prior to being loaded onto trucks for delivery. Under normal circumstances, the heat treatment, loading, and delivery procedures ensure against generation of objectionable odors. However, as with H-POWER, there are some periods when the heat treatment equipment will require regularly scheduled maintenance. We will review our procedures for sludge disposal during these periods and increase use of odor treatment systems. At this time, the Sand Island Wastewater Treatment Plant (SIWWTP), our largest source of sewage sludge, is initiating upgrades to improve overall handling and treatment of liquid and solid waste streams. We expect that the combination of using new odor treatment systems and improved solid waste handling at SIWWTP will markedly improve our ability to handle odor problems.

Litter Along Highways - Actions which are underway to address litter include use of additional fencing, work crews, and new equipment. Fencing designed to capture windblown litter had been previously cleaned with hand tools. Work crews will be provided with new equipment, such as MadVac, which incorporates a vacuum device to speed pickup of litter. This equipment will be truck-mounted to facilitate the removal of litter from off-site localities.

ENV has also consulted with refuse trucking firms to advise them of the importance of ensuring that refuse loads are properly covered prior to making deliveries to the landfill. Commercial and City refuse vehicles leaving the landfill are also being inspected to ensure they have thoroughly cleaned out their vehicle beds and/or are using their covers.

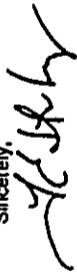
Additional measures are under consideration and include the potential for removal of paper and lightweight plastics from refuse going to the landfill. Use of this measure, however, will require further study to determine feasibility.

Mr. Adrian Foley
May 25, 2001
Page 3

3. Alternative Locations - The forthcoming Revised Draft SEIS will include additional information on ongoing efforts we have been taking to assess both technical and new landfill siting alternatives to the proposed expansion of Waimanalo Gulch.
4. Impact to Ko Olina Resort and Surrounding Land Uses - Under ideal circumstances, a sanitary landfill would be sited in a location with no potential for impacts to the natural environment or community. Realistically, ongoing urbanization on Oahu, combined with stringent State and Federal environmental regulations, makes the siting of any landfill a difficult undertaking for all involved. The proposed expansion of Waimanalo Gulch is based on thorough review and assessment of a number of potential alternatives, including new waste reduction technologies and over 40 potential landfill sites throughout Oahu. We have been able to obtain some information on community concerns and issues and are willing to implement practices and procedures, as needed, to reduce, minimize, or if possible, eliminate the potential for impacts. We appreciate any additional constructive comments you may provide on how we may improve our operations.
5. Public Notification of Revised Draft SEIS - Public notification of availability of the Revised Draft SEIS will be provided in the Office of Environmental Quality Control (OEQC) Environmental Notice. Copies of the Revised Draft SEIS will be available for review from OEQC and area libraries. We will also provide a copy of this document to the Kapolei/Makakilo/Honokai Hale Neighborhood Board.

We appreciated your review and constructive comments regarding the subject Draft SEIS. Should you have any further comments, please contact Ms. Wilma Namunnart of our office or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 688-2985 (extension 22).

Sincerely,



TIMOTHY E. STEINBERGER
Acting Director

Enclosure

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation



STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. BOX 3478
HONOLULU, HAWAII 96801

Ms. Wilma Mamunhart
July 5, 2000
Page 2

93-0498/epo

Mr. Chauncey Hew of the Safe Drinking Water Branch at 586-4258.

93-0498/epo

July 5, 2000

Ms. Wilma Mamunhart
Department of Environmental Services
City & County of Honolulu
650 South King Street, Third Floor
Honolulu, Hawaii 96813

Sincerely,
Gary Gill
Gary Gill
Deputy Director
Environmental Health Administration
c: SDRB

Dear Ms. Mamunhart:

Subject: Draft Supplemental Environmental Impact Statement
(DSEIS)
Waimanalo Gulch Sanitary Landfill Expansion
Ewa, Oahu
TRK: 9-2-03:72, 73

Thank you for allowing us to review and comment on the subject DSEIS. We have the following minor comments to offer, which we feel will make the DSEIS read more accurately:

On page 1-15, paragraph 1.4.10 Underground Injection Control (UIC) Line should be rewritten as follows:

The State DOH established the UIC program in 1984. The purpose of this program is to protect the State's potable groundwater resources from pollution by subsurface wastewater (disposal) injection. The program's regulations are accompanied by UIC maps which (demarcate) depict a boundary line known as the UIC Line. Lands that are mauka of this line are considered to overlay potable groundwater and underground injection is restricted to only nonpolluting activities. Lands that are makai of this line are (not) less restricted from (subsurface) wastewater disposal by underground injection. Location of the proposed landfill expansion is makai of the UIC line and therefore (is in conformance) conforms in principle with the purpose of the UIC program.

If there are any questions regarding these comments, please call

Post #	Ext	Room	Mail
7871		52	2
To	From		
John T. Adams	John T. Adams		
Phone	Room		
	52-1328		
Fax			
842-1487			

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 537-2883 • Fax: (808) 537-2678



TIMOTHY E. STEINBERGER, P.E.
ACTING DIRECTOR
IN REPLY REFER TO:
PE 01475

May 14, 2001

JEREMY HARRIS
MAILER

Mr. Gary Gill, Deputy Director
State Department of Health
P.O. Box 33378
Honolulu, Hawaii 96801

Dear Mr. Gill:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your comments dated July 5, 2000, concerning the subject Draft SEIS. We acknowledge your comment concerning our conformance in principle to the Underground Injection Control (UIC) program of the State Department of Health. Comments which you have provided will be incorporated into our forthcoming Revised Draft SEIS.

We appreciate your review of the Draft SEIS. Should you have any further comments, please contact Ms. Wilma Namumart at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (extension 22).

Sincerely,

TIMOTHY E. STEINBERGER
Acting Director

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation

July 1, 2000

Department of Environmental Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

RE: Draft Supplemental Environmental Impact Statement for the
Waimanalo Gulch Sanitary Landfill Expansion Dated April, 2000

Dear Sir or Madam:

The purpose of this letter is to express serious concerns I have regarding the Draft Supplemental Environmental Impact Statement (SEIS) for the expansion of the Waimanalo Gulch Sanitary Landfill prepared by Waste Management of Hawaii, Inc. and R.M. Towill Corp. I am a full time resident and owner of a townhouse at the Fairways in Ko Olina. During my comprehensive review of the SEIS, many concerns come to mind that are not adequately addressed in this document. My concerns deal with health and safety, the environment, and economics. I have outlined my issues and concerns below.

- **Groundwater Contamination:** The SEIS states that a liner system will be utilized to prevent the leakage of leachate into groundwater resources. It also states that monitoring wells will be installed in order to test for possible leachate contamination. It further states that, "as required" a leachate collection system will be installed within the landfill facility and pumped out regularly for treatment and disposal. I am confident that these measures are within City, County, and State regulations. However, what I do not know is what is done today at the current facility, how effective are these measures, and how and who monitors the Waste Management of Hawaii, Inc. to insure groundwater contamination is not occurring nor a threat.
- **Scenic Resources:** The SEIS mentions the region surrounding the landfill includes the Hawaiian Electric Kahe Power Plant, Kahe Point Beach Park, the Ko Olina Golf Course and the Ihilani Hotel. I find it quite interesting

that "The Fairways" complex, located in the Ko Olina Resort, is not mentioned. This complex consists of over 275 units and/or families. Should this not be a consideration? As I understand it, one of the criteria to select a location for a landfill is an area with minimal residential development. This may have been the case in 1984; however, it is not the case in 2000. As you may know, additional residential development is planned for Ko Olina, such as "high end" single family homes, duplexes, and a large timeshare project. This continued development of the leeward side of Oahu is not only good for the leeward side but for Oahu as a whole. It produces additional jobs and tax revenues. One could conclude if the application of the criterion of "minimum residential development" were applied for selecting a landfill site, this site would be precluded from consideration for expansion.

- **Leachate Production:** The SEIS uses terms such as, "mitigate the potential of leachate migration." What's the negative impact to the Fairways, the Ko Olina resort and the surrounding area should leachate migrate?
- **Odor Control:** The SEIS states that the natural tradewinds of the island help to dissipate ~~some~~ of the traces of odor. It further states that "approved practices" will be employed, such as soil cover. As a full time resident, I never want to smell the odors a landfill site produces. Unfortunately, there are times that I do. The only conclusion I can draw is that these measures are not sufficient to control the odors the existing landfill produces. And further more, I can only conclude that it will get worse if the existing location is expanded which will be even closer to my home.
- **Vector Problems:** This is already a significant problem at the Fairways. We have a problem with flies in this area worse than in other parts of the Island: I can only conclude this is due to the close proximity of the existing landfill.
- **Litter:** There is constantly litter up and down Farrington Highway. I know the Waste Management of Hawaii, Inc. has personnel on standby to collect litter off-site. They have also been very responsive when called to collect litter. However, what proactive measures are they willing to take to keep the surrounding area and highway clean? Should the community be responsible to "police" the windblown litter?
- **Gases:** The SEIS states that gases will be evacuated and vented. What are the hazards and the impact to air pollution for nearby areas as a result of these practices? In addition, the SEIS states the existing facility is

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equipped with an electronic, audible alarm for landfill gas detection. How many alarms have there been in the last five years? How were the alarms and issues remedied? The SEIS also states, "There have been no significant impacts at the existing landfill site resulting from concentrations of gas using the existing gas vent and/or gas recovery." What specifically does this mean? What are the toxic impacts of carbon dioxide, methane, nitrogen and hydrogen sulfide gases to the surrounding areas?

- **Alternative Sites:** The SEIS states that alternative sites were considered. It also states, "Due to difficulty in siting an entirely new facility and need for additional space for disposal of solid waste, the proposed expansion of the existing Waimanalo Gulch Sanitary Landfill is the preferred alternative." I believe that it is safe to say that the Waste Management of Hawaii, Inc. is proposing the easiest and least expensive solution to solve the problem. The management of Waste Management of Hawaii, Inc. has failed to accurately predict when additional landfill space would be needed. The waste company also states there is not enough time to find a new location, obtain the proper and necessary permits, and construct the landfill before the existing location is at full capacity. The implication is they are penalizing the residents, businesses and future development of Ko Olina, Kapolei, and Makakilo for their management's inability to accurately forecast the landfill needs.

I have also attached two newspaper articles that appeared in the *Honolulu Advertiser* on June 30th for your review. The first one addresses the Federal Government's interest in selling or leasing out land in several locations. The SEIS states the Federal Government is unwilling to relinquish certain locations that may be alternatives for landfill sites. Maybe since the development of the SEIS, the Federal Government may reconsider. Shouldn't every possibility be vigorously explored? The second article I have attached is in regards to Kauai's needs for a new landfill site. I find it quite interesting how proficiently and openly they are managing the process. Why can't the Waste Management of Hawaii, Inc. perform with the same proficiency and openness?

I am a very concerned resident. I am concerned about the environment and the community in which I live. I can not state one benefit to Ko Olina, Kapolei and Makakilo for the expansion of the existing landfill. However, I do see many benefits for Waste Management of Hawaii, Inc.

I strongly feel that this matter has thus far been mishandled and is only in the best interest of Waste Management of Hawaii, Inc. I do not believe that the SEIS accurately depicts the existing location and the impacts to the vicinity. I also do not believe they have done a thorough investigation of alternative sites and should be mandated to do so. Thank you for allowing me to share my concerns with you.

Respectfully yours,



Linda M. Porter
92-1459 F Alimui Drive
Kapolei, HI 96707
(808) 678-0747

cc: Councilmember John DeSoto, 9th District
Office of Environmental Quality Control
✓R.M. Towill Corporation

PEARL HARBOR

Navy will sell land to finance project

Ford Island calls for \$500 million

By Scott Williams
Associated Press Writer

PEARL HARBOR — The Navy is considering selling or leasing several of its properties on Oahu to finance its estimated \$300 million development of Ford Island.

The strategy is essential to the Navy's plan to develop commercial and residential areas on the 450-acre island in the heart of Pearl Harbor, Navy officials told a group of 60 people at the State Capitol in Honolulu yesterday.

Navy Capt. Jennifer M. Smith, head of engineering for the Navy Region Hawaii, said the creative financing is needed to develop Ford Island within 12 to 15 years.

"We want the most route of existing utility construction money through government funding, the desirable for full project would be up to \$200 million," Smith said.

Smith said developers and contractors would be invited to a September meeting at Ford Island to tour the island and other Navy properties up for sale or lease.

The Navy has sold Hawaii property before to pay for major construction. In 1992 the Navy's 108-acre Manele and 14-acre Pearl City properties were sold to the city for \$108 million. The money from the sale, made possible by special federal legislation, helped pay for construction of the Ford Island Bridge that will pave the way for development of the island.

Some of the Navy properties being considered for sale are:

A 25-acre property at the

See HWY, A19

ALBANY, N.Y., June 30, 2000 — The Albany Morning Star



Aerial view of Pearl Harbor looking southwest with Ford Island and Adm. Cleverly Bridge in foreground. U.S. Navy photo

Navy: Several sites may be sold

FROM PAGE ONE

Pearl Harbor Naval Magazine's Wakelee Branch, just west of the Wakelee Shopping Center.

Some Navy family housing and released property on Oahu, including the proposed Pearl Harbor area.

Various properties at the former Barbers Point Naval Air Station, including some housing areas there.

Various properties on the Pearl Harbor Naval Complex and Ford Island that are not essential to the Navy's military operations.

Navy spokesman Lt. Cmdr. Rod Gibbons said the Barbers Point golf course previously considered for sale probably won't be included on the list of properties for sale.

Sources said the Navy's Lush-ald property on the Leeward side would not be considered for sale or lease since it is still in operation.

The Navy yesterday said its housing area at Pearl City Peninsula, which recently underwent millions of dollars worth of renovations, also would remain under Navy authority.

Stanford Yuen, executive assistant for intergovernmental affairs

for Navy Region Hawaii, said building housing on Ford Island for 600 military families and several hundred units for single service personnel will help the Navy continue its operations in the Pearl Harbor area. The Ford Island plan also suggests commercial development on the south and central side of the island, including museums and supporting shops, restaurants and parks.

Charles Ota, director of military affairs for the Hawaii Chamber of Commerce, said the Navy's intention to sell or lease outlying properties hopefully means more construction jobs for the local construction industry.

"This means development goes way beyond the \$500 million projected for Ford Island alone," Ota said.

Navy officials declined to give a specific timetable for the development project, saying two reports need to be completed first: an environmental impact statement for the project and a report recommending ways to preserve historical structures on Ford Island, particularly those dating back to the 1941 attack on Pearl Harbor.

for Navy Region Hawaii, said building housing on Ford Island for 600 military families and several hundred units for single service personnel will help the Navy continue its operations in the Pearl Harbor area. The Ford Island plan also suggests commercial development on the south and central side of the island, including museums and supporting shops, restaurants and parks.

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Navy officials declined to give a specific timetable for the development project, saying two reports need to be completed first: an environmental impact statement for the project and a report recommending ways to preserve historical structures on Ford Island, particularly those dating back to the 1941 attack on Pearl Harbor.

Stanford Yuen, executive assistant for intergovernmental affairs

for Navy Region Hawaii, said building housing on Ford Island for 600 military families and several hundred units for single service personnel will help the Navy continue its operations in the Pearl Harbor area. The Ford Island plan also suggests commercial development on the south and central side of the island, including museums and supporting shops, restaurants and parks.

What's next

A September meeting for developers and contractors to tour Ford Island and the properties for sale or lease.

An executive director must be selected for a Ford Island Development Authority to oversee the creation of the master plan. That is expected after the September meeting.

A draft environmental impact statement is scheduled for completion by the end of the year, with the final statement ready six to 12 months later.

A contractor would then be selected to help develop a master development plan to submit to Congress.

For more information
Those seeking more about the redevelopment project can log on to the Ford Island Development Web site at www.hawaii.gov/foia or contact the Navy Region Hawaii Public Affairs Office at Pearl Harbor at 471-0281.

Kaua'i identifies 7 sites as landfill candidates

Selection expected as early as October

By Jan Teague
Aiea News Bureau

LIHUE, Kaua'i — County solid waste officials have identified seven potential sites for a new county landfill, and hope consultants will reduce that to a single recommendation by October or November.

The county's 34-acre Keleha Landfill Phase II, opened in 1981, a year after Hurricane Tia, is getting full in 1988 and took in 67,500 tons of solid waste.

The zone in 1988 permitted the county to expand the landfill vertically until it reaches a height of 80 feet. That gives it three to four more years.

Since landfills are politically and environmentally charged issues, the county is beginning its planning early. The 1983 landfill had to be rushed because the massive volume of

debris resulting from the hurricane quickly filled Phase I.

An area inside of Kaunuaui Highway from the existing landfill is one of the seven land-fill sites under consideration.

The others are scattered around the island.

Other sites are at Kamaehu near Kealia, Mā'alo near Līhā, Kōpū, Hāhale near Kōke'e Mill, Uka near Nānāka, Pō'i o Pōpō inside of Kaunuaui.

County solid waste coordinator Ivey Tangena said the consulting firm Earth Tech has the contract to identify a site. A detailed evaluation of the seven sites is expected from the consultant next month, and a recommendation of a preferred site is expected in October.

Public meetings will be scheduled to review the recommendations, said Jean Camp, executive assistant to Mayor Maryanne Kusaka, who sponsors solid waste issues.

Once a site is selected, environmental and engineering studies are expected to run through the middle of 2002.

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

80 SOUTH KING STREET, HONOLULU, HAWAII 96813
PHONE: (808) 521-7000 • FAX: (808) 521-6675



JEROME HARRIS
Mayor

THOMAS E. STEINBERGER, P.E.
ACTING DIRECTOR
IN REGULAR REFERENCE TO
PE 01-000

May 25, 2001

Ms. Linda M. Porter
92-1459 F Alimui Drive
Kapolei, Hawaii 96707

Dear Ms. Porter:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your comments dated July 1, 2000, concerning the subject Draft SEIS. We offer the following in response:

GROUNDWATER CONTAMINATION

Environmental Protection Agency (EPA) and State Department of Health (DOH) require the testing of groundwater resources which may underlie sanitary landfills to ensure that operating practices and procedures are sufficient to protect public health and the surrounding environment. Testing of groundwater monitoring wells at Waimanalo Gulch indicates that the facility remains in compliance with regulations.

Waste Management of Hawaii, Inc., operators of the facility, are required to utilize the services of an independent analytical laboratory to perform groundwater testing. The testing results, including chain of custody and related documentation, are submitted to DOH.

SCENIC RESOURCES

We acknowledge the presence of a number of developments within the Ko Olina Resort, including, but not limited to, Ko Olina Fairways, the newly constructed Brookfield Homes, the Marriott Iliani Hotel, Ko Olina Golf Course, Ko Olina Marina, Paradise Cove, and Lanikuhonua. We further acknowledge that there can be major economic benefits to both the region and to the City and County of Honolulu from development activities.

Public infrastructure services, such as provided by a municipal sanitary landfill, are an important and vital part of the mix of services needed to maintain and support development and growth. Under ideal circumstances, a sanitary landfill would be sited in a location with no potential for impacts to the natural environment or community. Realistically, ongoing urbanization on Oahu combined with stringent State and Federal environmental regulations, makes the siting of any landfill a difficult undertaking for all involved. The proposed expansion of Waimanalo Gulch

Ms. Linda Porter
May 25, 2001
Page 2

is based on thorough review and assessment of a number of potential alternatives, including new waste reduction technologies and over 40 potential landfill sites throughout Oahu. We have heard community concerns and issues and are willing to implement practices and procedures, as needed, to reduce, minimize, or if possible, eliminate the potential for impacts.

LEACHATE PRODUCTION

A groundwater monitoring program is in place to provide continuous long-term testing of groundwater. The monitoring program is designed to alert the City and Waste Management of Hawaii, Inc., of problems well in advance of adverse impacts to surrounding localities. Results of the monitoring program have indicated that the facility is operating within regulatory limits established by the State Department of Health, and EPA. For this reason, we do not foresee negative impacts to the surrounding area or region.

ODOR CONTROL

Odor and litter issues tend to increase whenever H-POWER is shut down for periodic maintenance. During these periods, waste which would ordinarily be incinerated is diverted to the landfill site. The following measures have been implemented to address this concern:

- A. New odor neutralizing solvents and deployment systems, such as manufactured by Benzaco Scientific, Inc., are being applied onsite to reduce or eliminate odors. These odor neutralizers are state-of-the-art and have been successfully used elsewhere by Waste Management of Hawaii.
- B. The key to managing the odor problem is to deploy the neutralizers prior to and during periods when municipal solid waste is diverted from H-POWER. We anticipate that fine-tuning of this equipment will be necessary to optimize the reduction of odors.
- C. The system in place uses a series of spray misters. Waste Management will make adjustments as necessary in the location of these misters to ensure off-loading trucks and the refuse itself are properly treated.
- D. As soon as possible, cover material must be placed over the refuse to further suppress odors.

Sewage sludge which is disposed of at the landfill has also been identified as a potential odor source. Sewage sludge is normally heat treated prior to being loaded onto trucks for delivery. Under normal circumstances, the heat treatment, loading, and delivery procedures ensure against generation of objectionable odors. However, as with H-POWER, there are some periods when the heat treatment equipment will require regularly scheduled maintenance. We will review our procedures for sludge disposal during these periods and increase use of odor treatment systems. At this time, the Sand Island Wastewater Treatment Plant (SIWWTP), our largest source of sewage sludge, is initiating upgrades to improve overall handling and treatment of liquid and solid waste streams. We expect that the combination of using new odor treatment systems and improved solid waste handling at SIWWTP will markedly improve our ability to handle odor problems.

The location of the proposed expansion will remain within the existing 200-acre landfill boundary. The majority of the expansion area will therefore place it further mauka of its current location.

VECTOR PROBLEMS

Waimanalo Gulch Sanitary Landfill is being monitored for vectors by Waste Management of Hawaii, Inc. We know of no increase in the population of flies attributable to the landfill. In the event that you should experience any vector problems at Ko Olina, we ask that you immediately contact Mr. Joseph Hernandez, Environmental Manager, Waste Management of Hawaii, Inc., at 668-2985, extension 22, or the State Department of Health, Vector Control Branch, at 831-6767.

LITTER PROBLEMS ALONG FARRINGTON HIGHWAY

Litter Along Highways - Actions which are underway to address litter include use of additional fencing, work crews, and new equipment. Fencing designed to capture windblown litter had been previously cleaned with hand tools. Work crews will be provided with new equipment, such as MacVac, which incorporates a vacuum device to speed pickup of litter. This equipment will be truck-mounted to facilitate the removal of litter from off-site locations.

ENV has also consulted with refuse trucking firms to advise them of the importance of ensuring that refuse loads are properly covered prior to making deliveries to the landfill. Commercial and City refuse vehicles leaving the landfill are also being inspected to ensure they have thoroughly cleaned out their vehicle beds and/or are using their covers.

Additional measures are under consideration and include the potential for removal of paper and lightweight plastics from refuse going to the landfill. Use of this measure, however, will require further study to determine feasibility.

LANDFILL GASES

The State DOH, through laws and regulations of the EPA, is responsible for regulating landfill generated gases. ENV and the operator of the landfill are responsible for compliance. Landfill management and monitoring of air quality have ensured that gases, such as methane, are not generated in sufficient quantities which could constitute a health hazard, either to the general public or to surrounding communities and neighbors. There have been no alarms to date involving the release of toxic or hazardous gases from the landfill.

Additional measures being considered by the City include the feasibility of recovering gas for the generation of electricity. The HECO Kaha Power Generating Station is located nearby and would be a logical user for either the gas or any electricity that may be produced. At this time, however, the dry climate of the site, combined with relatively low volumes of putrescible waste, precludes the feasible development of this option.

ALTERNATIVE SITES

Alternative Locations - The forthcoming Revised Draft SEIS will include additional information on ongoing efforts we have been taking to assess both technical and new landfill siting alternatives to the proposed expansion of Waimanalo Gulch.

We appreciated your review of the subject Draft SEIS. Should you have any further comments, please contact Ms. Wilma Namumart of our office at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (extension 22).

Sincerely,



TIMOTHY E. STEINBERGER
Acting Director

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation

JOHN DESOTO
 Councilmember
 (808) 547-7009 (Voice)
 (808) 527-4220 (Fax)
 Email: acdeso@hawaii.gov

CITY COUNCIL
 CITY AND COUNTY OF HONOLULU
 650 SOUTH KING STREET, HONOLULU, HAWAII 96813-3065 / TELEPHONE 547-7000

DIVISION OF REFUSE COLLECTION
 JUL 30 8 40 AM '00
 HAWAII 96813-3065

Refuse
 00-6442

RECEIVED
 JUN 29 10:02
 DEPT OF ENVIRONMENTAL SERVICES

Dr. Kern Sprague, Director
 Department of Environmental Services
 650 South King Street, 3rd Floor
 Honolulu, HI 96813

RE: Request for Additional Time to Comment on
 Waimanalo Gulch Landfill Expansion - Draft Supplemental EIS

Dear Dr. Sprague:

On behalf of the residents of Lerward Oahu, I would like to request an additional 45 days beyond the current deadline for community members to comment on the Draft Supplemental Environmental Impact Statement for the Waimanalo Gulch Landfill Expansion.

It is my understanding that Wai'anae Neighborhood Board #24 received the report after their June 6th meeting, and that the Makakilo/Kapolei/Honokai Hale Neighborhood Board #34 had not received a copy as of their June 21st meeting. Both boards are requesting additional time to review, discuss and take action on the proposed landfill expansion.

Your favorable consideration of this request will be greatly appreciated. If you have any questions, please feel free to contact me or my aide, Pamela Witty-Oakland, at 527-5693.

Sincerely,

 John DeSoto
 Councilmember, District IX

JD:pw
 03 03 00

cc: Maeda Timson, Makakilo/Kapolei/Honokai Hale Neighborhood Board #34
 Cynthia Rezzentes, Wai'anae Neighborhood Board #23

John DeSoto
John DeSoto
 Log # 14
 44242
 46664

SEARCHED	INDEXED
SERIALIZED	FILED
JUL 19 2000	
RATC	

BARRY RUKUNAGA
 DEPUTY DIRECTOR
 IN REPLY REFER TO:
 PE 00-089



July 14, 2000

The Honorable John DeSoto
 Councilmember, District IX
 City Council
 Honolulu Hall
 City and County of Honolulu
 Honolulu, Hawaii 96813-3065

Dear Councilmember DeSoto:

Subject: Waimanalo Gulch Sanitary Landfill Expansion
 Draft Supplemental EIS

We anticipated that residents in the vicinity of the landfill would have concerns about the proposed expansion and included Neighborhood Boards No. 24 (Wai'anae Coast) and No. 34 (Makakilo/Kapolei/Honokai Hale) on the document mailing list. Copies of the Draft Supplemental EIS were mailed to all entities on the list on May 23, 2000, along with the copies for the Wai'anae Public Library, the Hawaii State Library, the University of Hawaii Hamilton Library, and others required by the Office of Environmental Quality Control (OEQC).

By copy of this letter to OEQC, we are extending the deadline 45 days, from July 7 until August 21, 2000, to give the two Neighborhood Boards, and anyone else, additional time to submit their comments. If you have any questions, please call Wilma Namumhart of the Refuse Division at 527-5378.

Sincerely,

Kenneth E. Sprague
 KENNETH E. SPRAGUE
 Director

FORWARDED:

Benjamin B. Lee
 BENJAMIN B. LEE, FAIA
 Managing Director

cc: OEQC
 Wai'anae Coast N.B. No. 24
 Makakilo/Kapolei/Honokai Hale N.B. No. 34
 The Honorable Colleen Hanabusa
 Waste Management of Hawaii
 R.M. Towill

TROPOLITAN MM MANAGEMENT
Property Management Specialists

RECEIVED
JUN 30 10 40

Date: June 30, 2000
To: Department of Environmental Services
From: Jim Kolonick (President)
Metropolitan Management
Re: Waimanalo Gulch Sanitary Landfill Expansion

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR
BARRY FUCHINAGA
DEPUTY DIRECTOR
IN REPLY REFER TO:
RE 00-098 ✓



DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 537-6663 • Fax: (808) 537-6875

JEREMY HARRIS
MAYOR

July 19, 2000

Metropolitan Management represents the Ko'Oliina Community Association, of which Ko'Oliina Fairways a community consisting of 280 memberships, is one of them. Our residents strongly object to the Waimanalo Gulch Sanitary Landfill Expansion Proposal. If you have any questions regarding the Ko'Oliina Community Association and Ko'Oliina Fairways, please do not hesitate to contact me at 536-3511.

Mr. Jim Kolonick, President
Metropolitan Management
Amifac Center, Hawaii Tower
745 Fort Street, No. 2100
Honolulu, Hawaii 96813

Thanking you in advance for your cooperation and consideration in this matter.

Sincerely,

Jim Kolonick
Metropolitan Management - President
cc: Mayor Harris

Dear Mr. Kolonick:
SUBJECT: Notice of Extension of Receipt of Comments for the
Waimanalo Gulch Sanitary Landfill Expansion Supplemental EIS,
Waimanalo Gulch, Island of Oahu

This receipt of public comments for the subject Draft Supplemental EIS has been extended from: July 7, 2000, to August 21, 2000. Comments may be submitted to us at the above address.

Should you have any questions please contact Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985, or Mr. Brian Takeda, R.M. Towill Corporation, at 842-1133.

Sincerely,

KENNETH E. SPRAGUE
Director

cc: OEQC w/mailing list



745 Fort Street, #2100 • Amifac Center, Hawaii Tower • Honolulu, Hawaii 96813 • (808) 536-3511 • FAX (808) 537-3455



TIMOTHY E. STEINBERGER, P.E.
Acting Director
IN REPLY REFER TO:
RE 01-089

May 14, 2001

JEREMY HARRIS
MAYOR

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR
BARRY FUKUMAGA
DEPUTY DIRECTOR
IN REPLY REFER TO:
RE 00-171



JEREMY HARRIS
MAYOR

December 28, 2000

Mr. Jim Kolonick
President
Metropolitan Management
745 Fort Street, #2100
Honolulu, Hawaii 96813

Dear Mr. Kolonick:

Subject: Waimanalo Gulch Sanitary Landfill Expansion -
Draft Supplemental Environmental Impact Statement

Public response to the initial Draft Supplemental EIS has indicated the need for additional information on potential new technologies and alternative landfill sites; therefore, the City has decided to issue a Revised Draft Supplemental EIS which will provide expanded coverage of these issues

The Revised Draft Supplemental EIS is expected to be available mid-March 2001, and allow a new public comment period of 45 days. As discussed with you on November 27, 2000, the City and Waste Management of Hawaii have hired Herb Lee as community liaison to assist in broadening our community dialog on this issue.

Should you have any questions, please contact Ms. Wilma Namurnart of my staff at 527-5378.

Sincerely,

KENNETH E. SPRAGUE
Director

KS:wy(2691)

cc: Office of the Mayor

Mr. Jim Kolonick
Metropolitan Management
745 Fort Street, Suite 2100
Amfac Center, Hawaii Tower
Honolulu, Hawaii 96813

Dear Mr. Kolonick:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your comment letter dated June 30, 2000, concerning the subject Draft SEIS. This supplements our prior letters to you dated July 19, 2000, and December 28, 2000.

We acknowledge your objection to the proposed project. The Department of Environmental Services and the operator of the facility, Waste Management of Hawaii, Inc., understand your concern and have been actively seeking the input of the communities surrounding the landfill and landfill users to address stated concerns and issues.

We hope that you will offer your constructive comments so that we can improve our facility. Any further comments may be directed to Ms. Wilma Namurnart of our office at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 688-2985 (extension 22).

Sincerely,

TIMOTHY E. STEINBERGER
Acting Director

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU
801 SOUTH BERETANIA STREET
HONOLULU, HAWAII 96813 - AREA CODE (808) 529-3111
<http://www.honolulu.gov>

JEREMY HARRIS
MAYOR



LEE D. DONOHUE
CHIEF
MICHAEL CARVALLO
ROBERT AD
DEPUTY CHIEFS

June 29, 2000

OUR REFERENCE CS-JNB

TO: KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL SERVICES

ATTENTION: WILMA NAMUMNART

FROM: LEE D. DONOHUE, CHIEF OF POLICE
HONOLULU POLICE DEPARTMENT

SUBJECT: WAIMANALO GULCH SANITARY LANDFILL EXPANSION
WAIMANALO GULCH, ISLAND OF OAHU
TMK. 9-2-03-072 AND 073

Thank you for the opportunity to review and comment on the subject document. As previously stated, there may be an impact on calls for police service to the area while the landfill is being expanded.

If there are any questions, please call Carol Sodeiani of the Support Services Bureau at 529-3658.

Sincerely,

LEE D. DONOHUE
Chief of Police

By *Eugene Uemura*
EUGENE UEMURA
Assistant Chief
Support Services Bureau

cc: Department of Planning and Permitting
Office of Environmental Quality Control
R.M. Towill Corporation, Inc.

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU
800 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 527-4883 • Fax: (808) 527-5075

JOSIE HARRIS
LAWYER



TIMOTHY E. STEINBERGER, P.E.
ACTING DIRECTOR
WIRELESS: (808) 527-5075

May 14, 2001

Lee D. Donohue
Chief of Police
Honolulu Police Department
801 South Beretania Street
Honolulu, Hawaii 96813

Dear Chief Donohue:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your letter dated June 29, 2000, concerning the subject Draft SEIS. We acknowledge your comment that there may be an impact on calls for police service to the area during construction activities associated with the landfill expansion.

We wish to extend our appreciation to Lt. Greg Yamamoto, who on two separate occasions attended meetings before the community to provide answers to questions concerning the enforcement of highway litter laws. Although we were not able to discuss this matter with Lt. Yamamoto, we continue to seek the assistance of HPD to cite violators which litter the areas adjoining the Waimanalo Gulch Sanitary Landfill.

We appreciate your review of the Draft SEIS. Should you have any further comments, please contact Ms. Wilma Namumnart of our office at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (extension 22).

Sincerely,

Timothy E. Steinberger
TIMOTHY E. STEINBERGER
Acting Director

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation

KO OLINA COMMUNITY ASSOCIATION RECEIVED

92-619 Farrington Highway
Ko Olina, Hawaii 96707
Telephone 808-671-2512, Facsimile: 808-671-6448 30 P. 2 24

June 29, 2000

Via Certified Mail

Department of Environmental Services
City and County of Honolulu
630 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Subject: Comments to the Draft Supplemental Environmental Impact Statement for the Waimanalo Gulch Sanitary Landfill Expansion Dated April 2000

The Ko Olina Community Association (KOCA) has reviewed the Draft Supplemental Environmental Impact Statement (SEIS) for the Waimanalo Sanitary Landfill Expansion dated April 2000 and formally submits the following comments and concerns:

1. Consultation. Although Ko Olina Resort is located 200 feet from the landfill entrance road, KOCA was not consulted in preparation of the Draft SEIS (Section 9.4) and was not provided a copy of the Draft SEIS for review. A copy was obtained 12 days after its release on June 5, 2000 by chance during a periodic status check by KOCA staff.
2. Adjacent and Surrounding Uses. The location map (Figure 1-2) does not identify the Ko Olina Resort area, show major existing thoroughfares, and current geographical configurations of the Ko Olina lagoons. On this and other maps, more specific developments and proximity to the landfill site should be indicated clearly. In particular, existing residential developments such as the nearby agricultural lots, planned low-density residential

Department of Environmental Services
6/29/2000

Page 2

developments on the Ko Olina Resort, and the Honokai Hale area should be clearly depicted graphically.

3. Proximity to surrounding land uses: The SEIS states that the Ko Olina Golf Course and Ihilani Resort (J.W. Marriott Ihilani Resort and Spa) are one to two miles to the southeast. The Ko Olina Resort property is in fact much closer to the landfill site. New low-density residential units are being constructed as close as 1000 feet directly downwind from the landfill site and only 200 feet from the landfill entrance road. The SEIS should reflect this proximity and address associated impacts. We are particularly concerned about the expansion to the immediate east of the existing landfill, which will bring the landfill operations close to the highway and residential developments.
4. Airborne impacts: The SEIS states that impacts such as odor, dust and litter will be mitigated through various means, however, past experience has shown that these impacts are not addressed on a daily basis. Ko Olina Resort and other surrounding landowners have experienced problems with these impacts. Refuse trucks enroute to the landfill have often dropped litter along Farrington Highway. During certain wind conditions including no wind conditions, odors from the landfill can be detected on the Ko Olina Golf Course, Ihilani Resort, Lanikuhouua, Paradise Cove, and the guardhouse at the entrance to the Resort. Plastic bags and paper blown from the landfill litter the mountainside, resort site, near shore areas and the ocean; this is a persistent major problem. New residences consisting of single-family residential units in structures up to 30 feet high will be constructed near the highway interchange and will be even closer to the landfill and more sensitive to the odors, dust and noise generated at the landfill. The SEIS should be amended to reflect these problems and indicate mitigation measures to address these concerns in the future.
5. Visual Impacts: As shown in Figure 5-1 of the SEIS, the proposed landfill expansion will be highly visible from the JW Marriott Ihilani Resort and Spa as well as other areas of the Ko Olina Resort. It should be noted in the SEIS that the photos were taken

at ground level, such that the visual impacts would be much greater from upper levels of the 150-foot high hotel. Revegetation of the existing landfill area will help to reduce the visual impacts, but as the landfill operations move into the upper portions of the site they will be more visible than existing operations. Landscaping or buffer zones will not reduce the visual impact of the expanded operations, especially from upper floors of resort buildings.

6. Drainage Impacts. The SEIS needs to clarify existing drainage patterns and show more clearly (i.e. on maps and drawings) proposed drainage improvements to enable an assessment of how drainage is presently and planned to be handled to assure that leachates do not affect downstream properties and the coastal environment.

7. Fire hazard. The SEIS does not discuss potential fire hazards and how they would be addressed or prevented from occurring. We would note that in September 1999, there were 2 fires at the Kapaa Landfill, and that in 1994, a landfill in Nanakuli burned unabated for days emitting toxic fumes before it could be extinguished. There were landfill fires at the Waimamalo Gulch facility as recently as June 11 and June 23, 2000.

8. Duration of impacts: While the SEIS states that most of the impacts to Ko Olina Resort from the proposed landfill expansion will not be significantly different from current conditions, they will be extended for another 15 years. There was no indication in the 1984 EIS that the landfill could or would be expanded, and we had fully expected that the landfill would be permanently closed once it reached the capacity stated in the 1984 EIS. We strongly object to this latest expansion proposal.

9. Necessary Permits and Approvals: Please expand on the necessary permits and approvals, in particular the State Special Use Permit Amendment and Conditional Use Permit - why they are required, who would be the approving bodies, and the status of their approval. Shouldn't this expansion also be subject to amending the Public Infrastructure Map for Ewa?

10. Relationship to Land Use Plans, Policies, and Controls. We would like to see the relationship of the proposed expansion to land use plans, policies and controls discussed in much greater detail. This is required to be discussed in the EIS (Section 11-200-17(b), Hawaii Administrative Rules). In particular, we would note that the City and County of Honolulu's Ewa Development Plan (Page 4-24) states that "Siting and/or expansion of sanitary landfills should be analyzed and approved based on islandwide studies and siting evaluations." Clearly, this is not the case. The EIS rules provide that:

"Where a conflict or inconsistency exists, the statement shall describe the extent to which the agency or applicant has reconciled its proposed action with the plan, policy, or control, and the reasons why the agency or applicant has decided to proceed, notwithstanding the absence of full reconciliation." (Section 11-200-17(b), HAR)

11. Long Term Plan for Solid Waste Disposal. We would like to know why the City does not have a clear long term plan for solid waste disposal, and seems therefore almost forced at this time to expand this landfill.

12. Alternative Locations. The EIS devotes less than one page to a discussion of alternative locations. Per content requirements of Section 11-200-17 (f), Hawaii Administrative Rules:

"The draft EIS shall describe in a separate and distinct section alternatives which could attain the objectives of the action, regardless of cost, in sufficient detail to explain why they were rejected. The section shall include a rigorous exploration and objective evaluation of the environmental impacts of all such alternative actions. Particular attention shall be given to alternatives that might enhance environmental quality or avoid, reduce or minimize some or all of the adverse environmental effects, costs, and risks... In each case, the analysis shall be sufficiently detailed to allow the comparative evaluation of the environmental benefits, costs, and risks

Department of Environmental Services
679/2000

Page 5

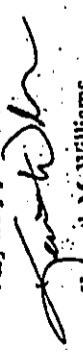
of the proposed action and each reasonable alternative.
(emphasis added)

We fail to see any such discussion. Use of closed landfills or Federal lands in current use or over ground-water areas do not seem to qualify as reasonable alternatives. We would suggest that the 1984 EIS (Table 6-1) and the 1995 Solid Waste Integrated Management Plan be used as starting points. We would also like to see alternatives such as use of only the rear portion of the existing landfill site be explored.

13. Final SEIS copies: Please provide three (3) copies of the Final SEIS to Ko Olina Community Association when available.

Thank you for allowing us the opportunity to comment on the SEIS for the Waimanalo Gulch Sanitary Landfill Expansion.

Very truly yours,



Kenneth M. Williams
General Manager

c: Office of Environmental Quality Control
R.M. Towill Corporation

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

929 SOUTH KING STREET, HONOLULU, HAWAII 96813
PHONE: (808) 521-4883 • FAX: (808) 521-4875



STANDARD MAIL

THOMAS E. STRANDBERG, P.E.
ACTING DIRECTOR
IN REPLY REFER TO:
PE 01-047

May 16, 2001

Mr. Kenneth M. Williams
General Manager
Ko Olina Community Association
92-619 Farrington Highway
Kapolei, Hawaii 96707

Dear Mr. Williams:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your comment letter dated June 29, 2001, concerning the subject Draft SEIS. We offer the following in response:

1. **CONSULTATION** - Public notification of the project EIS Preparation Notice was initially provided in the Office of Environmental Quality Control (OEQC) publication, the Environmental Notice, on December 8, 1999. Since then, public notification was again provided for the project Draft SEIS in the Environmental Notice on May 23, 2000. In conjunction with both notices, copies of both documents were provided to selected government agencies and members of the public. Based on public comments received, a Revised Draft SEIS will be prepared. In accordance with Chapter 343, HRS, we will again provide notice to all interested parties through OEQC. The public will again have opportunity to comment within the 45-day public comment period.
2. **ADJACENT AND SURROUNDING USES, AND PROXIMITY TO SURROUNDING USES** - The Revised Draft SEIS will provide further discussion and delineation of projects in proximity to the proposed landfill expansion.
3. **AIRBORNE IMPACTS** - Potential for adverse environmental impacts, including odor, dust, and litter, will be further discussed in the forthcoming Revised Draft SEIS. Mitigation measures will be provided to reduce, minimize, and, if possible, eliminate potential for impacts.

Mr. Kenneth M. Williams
May 16, 2001
Page 2

4. **VISUAL IMPACTS** - Additional photographic analysis depicting the proposed landfill expansion will be provided in the Revised Draft SEIS. You are correct in that landscaping or buffer zones will not completely screen views of the landfill from the public. It is expected that the proposed landscaping plan, in conjunction with the location of the majority of the expansion site in the mauka portion of the Waimanalo Gulch, will minimize visual impacts.

5. **DRAINAGE IMPACTS** - A description of the onsite drainage control system and leachate control system will be provided in the Revised Draft SEIS. As described in the Draft SEIS, the existing onsite drainage control system is designed to handle storm flows from a 622-acre drainage area, which includes the 200-acre Waimanalo Gulch Sanitary Landfill site. The expansion area will be properly graded and sloped for integration into the existing drainage control system.

6. **FIRE HAZARD** - According to Waste Management of Hawaii, Inc., on June 11, 2000, there was a small fire on a refuse truck delivering waste to H-POWER. The truck was diverted to the Waimanalo Gulch Sanitary Landfill for assistance. The fire was contained and extinguished with the assistance of the Honolulu Fire Department the same day.

Neither ENV or Waste Management of Hawaii, Inc., is aware of the second fire, which you describe as occurring on June 23, 2000.

Potential for fires at the landfill is addressed through an emergency plan, which tasks an emergency coordinator with overall fire control management. Preventative practices, equipment, and coordination with the Honolulu Fire Department and Honolulu Police Department are employed to ensure safety to site workers and the surrounding public. The incident on June 11, 2000, is an example of the immediate use and application of the onsite practices and measures that are employed to handle fires.

7. **DURATION OF IMPACTS** - We acknowledge your objection to the proposed project. Public infrastructure services, such as provided by a municipal sanitary landfill, are an important and vital part of the mix of services needed to maintain and support development and growth of projects like Ko Olina. Under ideal circumstances, a sanitary landfill would be sited in a location with no potential for impacts to the natural environment or community. Realistically, ongoing urbanization on Oahu, combined with stringent State and Federal environmental regulations, makes the siting of any landfill a difficult undertaking for all involved.

Mr. Kenneth M. Williams
May 16, 2001
Page 3

The proposed expansion of Waimanalo Gulch is based on thorough review and assessment of a number of potential alternatives, including new waste reduction technologies and over 40 potential landfill sites throughout Oahu. We have heard community concerns and issues and are willing to implement practices and procedures, as needed, to reduce, minimize, or, if possible eliminate, the potential for impacts.

8. **NECESSARY PERMITS AND APPROVALS** - Further discussion of permits and approvals required for the proposed expansion will be provided in the forthcoming Revised Draft SEIS.
9. **RELATIONSHIP TO LAND USE PLANS, POLICIES AND CONTROLS** - Additional discussion of permits and approvals needed for the proposed project will be provided in the forthcoming Revised Draft SEIS.
10. **LONG TERM PLAN FOR SOLID WASTE DISPOSAL** - The proposed Waimanalo Gulch Sanitary Landfill Expansion is designed to address the long-term need for a sanitary landfill for a period of approximately 15 years. At the same time, the siting of a municipal sanitary landfill is expected to remain a difficult process due to ongoing changes in land use and development on Oahu. Whenever feasible, new technologies will be implemented to better provide for the reduction of municipal solid waste requiring disposal in landfills.
11. **ALTERNATIVE LOCATIONS** - As noted, further discussion of alternative locations for landfills will be provided in the Revised Draft SEIS.
12. **FINAL SEIS COPIES** - Copies of the Revised Draft SEIS will be made available for public review through OEQC and at selected public libraries (as determined by OEQC). A copy of this document will be provided to you as requested.

We appreciate your review of the subject Draft SEIS. Should you have any further comments, please contact Ms. Wilma Namunart of our office at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (ext. 22).

Sincerely,



TIMOTHY E. STEINBERGER
Acting Director

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation.



STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

226 SOUTH BERTANNA STREET
SUITE 702
HONOLULU, HAWAII 96813
TELEPHONE (808) 586-4188
FACSIMILE (808) 586-4188

June 28, 2000

GENEVIEVE SALMONSON
DIRECTOR

Mr. Sprague
Page 2

Should you have any questions, please call Jeyan Thirugnanam at 586-4185.

Sincerely,

Genevieve Salmonson
Genevieve Salmonson
Director

C: W.M. Towill

Mr. Kenneth Sprague, Director
City and County of Honolulu
Department of Environmental Services
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Sprague:

Subject: Draft Environmental Impact Statement for the Expansion of the Waimanalo Gulch Sanitary Landfill, Oahu

Thank you for the opportunity to review the subject document. We have the following comments.

1. In accordance with section 11-200-20(d) of Hawaii Administrative Rules, please sign and date the original copy of the draft or final EIS and indicate that the statement and all ancillary documents were prepared under the signatory's direction or supervision and that the information submitted, to the best of the signatory's knowledge fully addresses document content requirements as set forth in sections 11-200-17 and 11-200-18, as appropriate.
2. Please study the potential of using the methane gas produced by the landfill for beneficial purposes. The landfill is near several industrial facilities that can probably use the methane or convert it into energy.
3. Please include a synopsis of the unresolved issues in the executive summary.
4. If the predicted solid waste diversion rate is not reached, is there more room to expand the landfill at the present site?

JEREMY HARRIS
MAYOR



TIMOTHY E. STEINBERGER, P.E.
Acting Director
BY REPLY REFER TO:
PE 01-006

May 16, 2001

Ms. Genevieve Salmonson, Director
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

Dear Ms. Salmonson:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your comment letter dated June 28, 2000, concerning the subject Draft SEIS. We offer the following in response:

1. Per your instructions, the Revised Draft SEIS shall include a signatory sheet with statement of supervision concerning the preparation of the document.
2. Waste Management of Hawaii, Inc., will provide for recovery of landfill gas for the generation of energy. As you are aware, the HECO Kahe Power Generating Station is located nearby and would be a logical user for either the gas or any electricity that may be produced.
3. The Executive Summary of the Revised Draft SEIS shall contain a synopsis of unresolved issues.
4. There is sufficient room for expansion of the proposed project within the existing 200-acre property. Although the expansion involves a planned lifespan of approximately 15 years, a number of factors could extend or reduce capacity. These factors include: the state of the economy (periods of economic prosperity tend to result in greater generation of refuse); the state of maturing new alternative technologies, such as plasma arc incineration, which may one day further reduce, but not completely eliminate, municipal solid waste requiring landfill disposal; and natural disasters, such as hurricanes, which will require a site for the disposal of clean-up debris.

Ms. Genevieve Salmonson
May 16, 2001
Page 2

We appreciate your review of the subject Draft SEIS. Should you have any further comments, please contact Ms. Wilma Namumnat of our office at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 688-2985 (ext. 22).

Sincerely,

TIMOTHY E. STEINBERGER
Acting Director

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation



MAKAILO/KAPOLEI/HONOKAI HALE NEIGHBORHOOD BOARD NO. 34
44 WILSON DRIVE, SUITE 200 • WILSON, HAWAII 96793

Refuse 5/10/00
00-0217
00-98

RECEIVED
JUN 30 10:47
DEPT OF ENVIRONMENTAL SERVICES

June 27, 2000

Department of Environmental Services
City and County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Re: Waimanalo Gulch Sanitary Landfill Expansion
Draft Supplemental Environmental Impact Statement (EIS)

Gentlemen:

On June 21, 2000 at our regular monthly Neighborhood meeting, the above referenced EIS was discussed as a concern from the community in attendance.

Let us first note that this Board was not consulted as stated in Chapter 9 of the EIS. Waste Management of Hawaii, Inc. informed us that an EIS was being prepared and that we would receive a copy for comment and a presentation would be made to our community. This was agreeable to us. However, we were not provided with the EIS because of an oversight by the consultant, R.M. Towill Corp and a presentation by Waste Management of Hawaii, Inc. is not yet scheduled.

As a result, the Board is requesting for an extension of 45 days from the due date and that this project not move forward until then to allow for our committee review and a presentation. We feel that this is a major expansion in our community and we must be allowed a complete review.

Concerns and comments stated by the community and Board on June 21st were:

1. Ko Olina Development, Hawaiian Electric and the Makai/Kapolei/Honokai Hale Neighborhood Board, the immediate neighbors to the landfill, did not receive a copy of the EIS. Why?
2. In 1984, the City said that the landfill would not be expanded at maturity. What happened with that agreement?
3. The landfill is now in the midst of a new City of homes, more industry, development and a larger population. Shouldn't the landfill be moved out of Kapolei?
4. Modern alternatives of trash disposal has been introduced throughout the US and Hawaii, eliminating landfills. The EIS does not address these alternatives. Why?
5. A landfill is a desecration of the aina.



Oahu's Neighborhood Board System - Established 1977

Sincerely,

Maeda C. Timson
Maeda C. Timson
Chair

92-684 Nobonus St.
Kapolei, HI. 96707
Daytime No. 525-5601
Evening No. 672-9414

MCT: ak

cc: Mayor Jeremy Harris
Councilmember John DeSoto
Senator Colleen Hanabusa
Representative Mike Kahikina

We await your response.

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

850 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 527-4443 • Fax: (808) 527-4475



JEREMY HARRIS
MAYOR

EDMUND E. SPRAGUE, P.E., Ph.D.
DIRECTOR
BARRY FUKUNAGA
DEPUTY DIRECTOR
IN REPLY REFER TO:
RE 00-0911

July 19, 2000

Ms. Maeda Timson, Chairperson
Makakilo/Kapolei/Honokai Hale Neighborhood Board No. 34
92-684 Nohana Street
Kapolei, Hawaii 96797

Dear Ms. Timson:

SUBJECT: Notice of Extension of Receipt of Comments for the
Waimanalo Gulch Sanitary Landfill Expansion Supplemental EIS,
Waimanalo Gulch, Island of Oahu

The receipt of public comments for the subject Draft Supplemental EIS has been extended from July 7, 2000, to August 21, 2000. Please provide notice of this extension at your next regularly scheduled meeting of the Makakilo/Kapolei/Honokai Hale Neighborhood Board.

Should you have any questions please contact Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985, or Mr. Brian Takeda, R.M. Towill Corporation, at 842-1133.

Sincerely,

EDMUND E. SPRAGUE
Director

cc: The Honorable John DeSoto, Councilmember
OEQC w/mailling list

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

850 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 527-4443 • Fax: (808) 527-4475



JEREMY HARRIS
MAYOR

EDMUND E. SPRAGUE, P.E., Ph.D.
DIRECTOR
BARRY FUKUNAGA
DEPUTY DIRECTOR
IN REPLY REFER TO:
RE 00-169

December 28, 2000

Ms. Maeda Timson, Chairperson
Makakilo/Kapolei/Honokai Hale Neighborhood Board No. 34
92-684 Nohana Street
Kapolei, Hawaii 96707

Dear Ms. Timson:

Subject: Waimanalo Gulch Sanitary Landfill Expansion -
Draft Supplemental Environmental Impact Statement

Public response to the initial Draft Supplemental EIS has indicated the need for additional information on potential new technologies and alternative landfill sites; therefore, the City has decided to issue a Revised Draft Supplemental EIS which will provide expanded coverage of these issues

The Revised Draft Supplemental EIS is expected to be available mid-March 2001, and allow a new public comment period of 45 days. As discussed with you on November 27, 2000, the City and Waste Management of Hawaii have hired Herb Lee as community liaison to assist in broadening our community dialog on this issue.

Should you have any questions, please contact Ms. Wilma Namunnart of my staff at 527-5378.

Sincerely,

EDMUND E. SPRAGUE
Director

KS:wy(2662)

cc: Office of the Mayor

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

850 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 537-5603 • Fax: (808) 537-5675



JEREMY HARRIS
MAIL ROOM

TRACY E. STEWART, P.E.
ACTING DIRECTOR
MAIL ROOM REFER TO:
PC 01-072

May 14, 2001

Ms. Maeda C. Timson, Chair
Makiki/Kapolei/Honokai Hale Neighborhood Board No. 34
c/o Neighborhood Commission
City Hall, Room 400
Honolulu, Hawaii 96813

Dear Ms. Timson:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your comments dated June 27, 2000, concerning the subject Draft SEIS. This supplements our prior letters to you dated July 19, 2000, and December 28, 2000. We offer the following itemized response to your comments:

1. *"Ko Olina Development, Hawaiian Electric and the Makiki/Kapolei/Honokai Hale Neighborhood Board, the immediate neighbors to the landfill, did not receive a copy of the EIS. Why?"*

Public notification of the project EIS Preparation Notice was initially provided in the Office of Environmental Quality Control (OEQC) publication, the Environmental Notice, on December 8, 1999. Since then, public notification was again provided for the project Draft SEIS in the Environmental Notice on May 23, 2000. In conjunction with both notices, copies of both documents were provided to selected government agencies and members of the public. Based on public comments received, a Revised Draft SEIS will be prepared. In accordance with Chapter 343, HRS, we will again provide notice to all interested parties through OEQC. The public will again have opportunity to comment within the 45-day public comment period.

2. *"In 1984, the City said that the landfill would not be expanded at maturity. What happened with that agreement?"*

ENV has conducted an exhaustive examination of prior correspondence and documentation from the early 1980s to the current period, relating to a stated promise or commitment that the landfill would not be expanded. No record of a commitment can be found and, therefore, we cannot verify nor disprove this claim.

Ms. Maeda C. Timson
May 14, 2001
Page 2

3. *"The landfill is now in the midst of a new City of homes, more industry, development and a larger population. Shouldn't the landfill be moved out of Kapolei?"*

We agree that since 1984, there have been major regional land use changes in Ewa. We believe this has been due, in part, to: 1) the designation of Kapolei as the secondary urban center; 2) major new investment in locations, including Ko Olina, for resort, residential, and commercial development; and 3) existing resort, commercial, industrial, and related businesses which are achieving maturity in the region.

At the same time, public infrastructure services, such as provided by a municipal sanitary landfill, are an important and vital part of the mix of services needed to maintain and support development and growth of projects such as Ko Olina. Under ideal circumstances, a sanitary landfill would be sited in a location with no potential for impacts to the natural environment or community. Realistically, ongoing urbanization on Oahu, combined with stringent State and Federal environmental regulations, makes the siting of any landfill a difficult undertaking for all involved. The proposed expansion of Waimanalo Gulch is based on thorough review and assessment of a number of potential alternatives, including new waste reduction technologies and over 40 potential landfill sites throughout Oahu.

We have heard community concerns and issues and are willing to implement practices and procedures, as needed, to reduce, minimize, or, if possible eliminate the potential for impacts.

4. *"Modern alternatives of trash disposal has been introduced through the US and Hawaii, eliminating landfills. The EIS does not address these alternatives. Why?"*

An expanded discussion of both alternative technologies and alternative locations for the siting of a municipal sanitary landfill will be provided in the forthcoming Revised Draft SEIS.

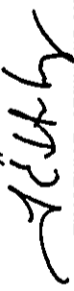
5. *"A landfill is a desecration of the aina."*

The Department of Environmental Services and the operator of the landfill, Waste Management of Hawaii, Inc., consider the land of Waimanalo Gulch an important, finite, and precious resource of the City and County of Honolulu and the broader island community of Oahu. This is reflected in management practices which seek to minimize, mitigate, and if possible, eliminate any potential for adverse impacts to either the land or the environment.

Ms. Maeda C. Timson
May 14, 2001
Page 3

We appreciate your review of the Draft SEIS. Should you have any further comments, please contact Ms. Wilma Namunhart of our office at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 688-2985 (extension 22).

Sincerely,



TIMOTHY E. STEINBERGER
Acting Director

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation

1998 HAWAIIAN LEGISLATURE
MEMBER
VICTOR B. CHAMBERLAIN
1ST DISTRICT
J. WASH. JR.
2ND DISTRICT
J. W. WONG
3RD DISTRICT
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The Senate
The Twentieth Legislature
of the
State of Hawaii
STATE CAPITOL
HONOLULU, HAWAII 96813
June 23, 2000

The Senate
State of Hawaii

Mr. Chester Koga
R.M. Towill Corporation
June 23, 2000
Page 2 of 3



Members voiced a strong desire to review and comment on the report as they have a number of concerns about the Waimanalo Gulch Landfill operations. It was pointed out that:

1. The previous commitments that were made have not been kept;
2. Assurances were given that the landfill would not be expanded;
3. The landfill is in close proximity to a major resort and planned housing development;
4. Despite efforts, trash continually litters the area and is not under control—some of it ending up in the ocean;
5. Delivery trucks do not secure their loads;
6. An odor permeates down to the ocean area when the winds are up;
7. On a recent inspection of the Kahe power station, trash debris was openly visible on the mountainside and against the fence. It was represented that it was a "good day" and that it happens despite the efforts of the landfill to control the problem;
8. While on the tour it was also mentioned that the power plant was concerned about the flying debris hitting the transmission lines; and,
9. Were alternatives to expanding the landfill or other possible sites considered?

The next scheduled meeting of N/B 34 will take place on Wednesday, July 19.

We are certain that you will agree that community consideration and involvement in this process is crucial and should be encouraged.

SENT VIA FACSIMILE AND REGULAR MAIL

Chester Koga
Project Manager
R.M. Towill Corporation
420 Waiakamilo Road, Suite 411
Honolulu, Hawaii 96817-4941

Facsimile No.: (808) 842-1937

RE: Request for Additional Time to Submit Comments on
Waimanalo Gulch Landfill Expansion—Draft Supplemental EIS

Dear Mr. Koga:

Thank you for forwarding my office a copy of the Draft Supplemental Environmental Impact Statement, Waimanalo Gulch Sanitary Landfill Expansion, Waimanalo Gulch, Island of Oahu, TMK 9-2-03: 072 and 073.

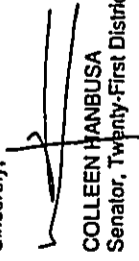
My office has been in contact with the Wai'anae Coast Neighborhood Board No. 24 (N/B 24) and the Makaloa/Kapolei/Honokai Hale Neighborhood Board No. 34 (N/B 34), both Boards represent the communities that will be directly impacted by the proposed expansion project. They have informed us that they will not be able to submit comments by the July 7 deadline and would appreciate additional time to do so.

N/B 24's Planning and Zoning Committee received a copy of the draft EIS report prior to its June 15 meeting. The next scheduled meeting of the full neighborhood board will take place on Wednesday, July 5.

At its June 21 meeting, N/B 34 informed the community that it did not receive a copy of the report and, therefore, has not had the opportunity to review it. (Although it is not legally required, it is our understanding that a courtesy copy is usually presented to the neighborhood board that is directly impacted by the project.) The Board also will be seeking additional time to submit its comments.

Your consideration of this request and cooperation is greatly appreciated.

Sincerely,


COLLEEN HANBUSA
Senator, Twenty-First District

cc: Mayor Jeremy Harris
Councilmember John Desoto
Wilma Namunnart, Dept. of Environmental Services
Joseph Hernandez, Waste Management of Hawaii
Neighborhood Board No.s 24 & 34

PHONE (808) 594-

FAX (808) 594-1065

DEPARTMENT OF ENVIRONMENTAL SERVICES

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 527-4663 • Fax: (808) 527-4675

STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
711 KAPTOLOANI BOULEVARD, SUITE 500
HONOLULU, HAWAII 96813

May 22, 2000

Ms. Wilma Namunnart
Department of Environmental Services
City & County of Honolulu
650 South King Street, 3rd Floor
Honolulu, Hawaii 96813

Subject: Draft Supplemental Environmental Impact Statement for
Waimanalo Gulch Sanitary Landfill Expansion; Waimanalo Gulch,
Island of Oahu; TMK 9-2-03: 072 and 073

Dear Ms. Namunnart,

Thank you for the opportunity to review and comment on the above-referenced document. As with any project, the Office of Hawaiian Affairs is concerned that subsurface archaeological, historical and cultural remains may be impacted. According to your findings the proposed project is not anticipated to result in adverse impacts to archaeological or cultural resources in the area and coordination with the State Historic Preservation Division of the Department of Land and Natural Resources has found that no known historic sites exist within the expansion area.

Based upon this information, the Office of Hawaiian Affairs has no further concerns at this time. If you have any question, please contact Ken R. Salva Cruz, Policy Analyst, at 594-1847.

Sincerely,

Colin C. Kippen, Jr.
Colin C. Kippen, Jr.
Deputy Administrator

cc: Board of Trustees
Department of Planning and Permitting
Waste Management of Hawai'i, Inc.
R.M. Towill Corporation
OEQC

SPRING HARBOR
MAILBOX



June 21, 2000

Mr. Colin C. Kippen, Jr.
Deputy Administrator
Office of Hawaiian Affairs
711 Kapiolani Boulevard, Suite 500
Honolulu, Hawaii 96813

Dear Mr. Kippen:

Subject: Draft Supplemental Environmental Impact Statement for
Waimanalo Gulch Sanitary Landfill Expansion,
Island of Oahu, TMK: 9-2-072 and 073

Thank you for your letter dated May 22, 2000. We acknowledge your comment that the Office of Hawaiian Affairs has no further concerns at this time concerning the proposed project.

We appreciate the time you have taken to review this project. Should you have any further questions, please contact Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985.

Sincerely,
Kenneth E. Sprague
KENNETH E. SPRAGUE
Director

Attach.

cc: Mr. Brian Takeda - R.M. Towill Corporation
Mr. Joe Hernandez - Waste Management of Hawaii, Inc.

RTS	AK
NM	
RF	
REC'D	JUN 26 2000
AMTC	

KENNETH E. SPRAGUE, P.E., Ph.D.
DIRECTOR
BARRY FUKUNAGA
DEPUTY DIRECTOR
BY REPLY REFER TO:
RE 00-093

COPY

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**FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU**
375 KAPAAHUA STREET, SUITE 4425 • HONOLULU, HAWAII 96819-1159
TELEPHONE: (808) 831-7751 • FAX: (808) 831-7750 • INTERNET: www.hawaii.gov



JEREMY HARRIS
MAYOR

ATLUSO A. LEONARDO
FIRE CHIEF
JOHN CLARK
ACTING FIRE CHIEF

June 13, 2000

TO: KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL SERVICES

ATTENTION: WILMA NAMUMNART
PLANNING AND ENGINEERING BRANCH
REFUSE DIVISION

FROM: JOHN CLARK, ACTING FIRE CHIEF

SUBJECT: DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
WAIMANALO GULCH SANITARY LANDFILL EXPANSION
WAIMANALO GULCH, ISLAND OF OAHU
TAX MAP KEY: 9-2-003: 072 AND 073

We received the request for comments regarding the above-mentioned project. The Honolulu Fire Department requests that fire apparatus accessibility be maintained throughout the construction site for the duration of the project.

Should you have any questions, please call Battalion Chief Kenneth Silva of our Fire Prevention Bureau at 831-7778.


JOHN CLARK
Acting Fire Chief

JCKS:ms

cc: Randall K. Fujiki, Department of Planning and Permitting
Brian Takeda, R.M. Towill Corporation

**DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU**
650 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 527-6863 • Fax: (808) 537-6875



JEREMY HARRIS
MAYOR

WES	KIS	TIMOTHY E. STEINBERGER, P.E. ACTING DIRECTOR
R-F	NA	APPROVED FOR TO:
RTT	BRT	RE 01-078
REC'D MAY 17 2001 UNIT		

May 14, 2001

Mr. Attilio K. Leonard
Fire Chief
Honolulu Fire Department
3375 Koapaka Street, Suite H425
Honolulu, Hawaii 96819


Dear Chief Leonard:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your letter dated June 13, 2000, concerning the subject Draft SEIS. Fire apparatus access will be provided throughout the construction site for the duration of the project.

We appreciate your review of the Draft SEIS. Should you have any further comments, please contact Ms. Wilma Namumnart at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (extension 22).

Sincerely,


TIMOTHY E. STEINBERGER
Acting Director

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
P.O. BOX 671
HONOLULU, HAWAII 96809

June 27, 2000

LD-NRV

Ref.: WAIMANALOGULCH.RCM3

Honorable Ronald K. Fujiki
Planning Director
City and County of Honolulu
Department of Planning and Permitting
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Fujiki:

SUBJECT: Draft Environmental Impact Statement for Waimanalo
Gulch Sanitary Land Fill Expansion

This is a follow-up to our letters to you dated June 8 and
June 19, 2000 (Ref.: WAIMANALOGULCH.RCM and RCM2) regarding the
subject matter.

Attached herewith is a copy of our Land Division Engineering
Branch comment.

The Department has no other comment to offer on the subject
matter at this time.

Should you have any questions, please feel free to contact
Nicholas Vaccaro of the Land Division's Support Services Branch
at 808-587-0438.

Very truly yours,

DEAN Y. UCHIDA
Administrator

C: Oahu District Land Office
R. M. Towill Corporation

DLNR-LAND DIVISION
ENGINEERING BRANCH

Ref.: WAIMANALOGULCH.COM

COMMENTS

The proposed Sanitary Landfill Expansion does not affect our current projects and programs.

We confirm that the project site, according to FEMA Community Panel Number 15001 0130 C,
is located in Zone D. This is an area in which flood hazards are undetermined.

If further studies indicate that the project site is within the flood hazards area, the proposed
project must comply with rules and regulations of the National Flood Insurance Program (NFIP)
and all applicable County Flood Ordinances. If there are questions regarding the NFIP, please
contact the State Coordinator, Sterling Yong, of the Department of Land and Natural Resources
at 587-0248. If there are questions regarding flood ordinances, please contact the applicable
County representative.

M:\WLD\WAKAUSUZIE\OAHU\W_Gulch071.DOC



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

HONOLULU, HAWAII 96819
June 19, 2000

LD-NAV

Ref.: WAIMANALOGULCH.RCH2

Honorable Ronald K. Fujiki
Planning Director
City and County of Honolulu
Department of Planning and Permitting
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Fujiki:

SUBJECT: Draft Environmental Impact Statement for Waimanalo
Gulch Sanitary Land Fill Expansion

This is a follow-up to our letter to you dated June 8, 2000
(Ref.: WAIMANALOGULCH.RCH) regarding the subject matter.

Attached herewith is a copy of our Commission on Water
Resource Management's comments related to water resources.

The Department has no other comment to offer on the subject
matter at this time.

Should you have any questions, please feel free to contact
Nicholas Vaccaro of the Land Division's Support Services Branch
at 809-587-0438.

Very truly yours,

Dean Y. Uchida
DEAN Y. UCHIDA
Administrator

C: Oahu District Land Office
R. H. Towill Corporation

JUN 21 11 11 01

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
Land Division
Honolulu, Hawaii
May 25, 2000

Suspense Date: 06/29/00

Ref.: WAIMANALOGULCH.COM

MEMORANDUM:

- TO: XXX Division of Aquatic Resources
- XXX Division of Forestry & Wildlife
- XXX Division of State Parks
- Division of Boating and Ocean Recreation
- Historic Preservation Division
- XXX Commission on Water Resource Management
- Land Division Branches of:
- XXX Planning and Technical Services
- XXX Engineering Branch
- XXX Oahu District Land Office
- XXX Shoreline Processing Services

FROM: Dean Y. Uchida, Administrator
Land Division

SUBJECT: Review Draft Supplemental Environmental Impact Statement
for Waimanalo Gulch Sanitary Land fill Expansion Island of
Oahu, Hawaii - Tax Map Keys: 9-2-03: 072 and 073

Please review the Draft Supplemental Environmental Impact Statement

ONE (1) COPY OF THE SUBJECT DOCUMENT IS LOCATED IN ROOM 220

If this office does not receive your comments on or before the
suspense date, we will assume there are no comments.

() We have no comments.

Comments attached.

Signed: *Andrew M. Norden*
ANDREW M. NORDEN, CHIEF ENGINEER
Date: 6/21/00

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
Land Division
Honolulu, Hawaii
May 25, 2000

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
Land Division
Honolulu, Hawaii
May 25, 2000

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
P.O. BOX 541
HONOLULU, HAWAII 96808
June 5, 2000

Ref.: WAIMANALOGULCH.COM
Suspense Date: 06/29/00

- TO:
- XXX Division of Aquatic Resources
 - XXX Division of Forestry & Wildlife
 - XXX Division of State Parks
 - Division of Boating and Ocean Recreation
 - Historic Preservation Division
 - Commission on Water Resource Management
 - Land Division Branches of:
 - XXX Planning and Technical Services
 - XXX Engineering Branch
 - XXX Oahu District Land Office
 - XXX Shoreline Processing Services

FROM: Dean Y. Uchida, Administrator
Land Division

SUBJECT: Review Draft Supplemental Environmental Impact Statement for Waimanalo Gulch Sanitary Land fill Expansion Island of Oahu, Hawaii - Tax Map Keys: 9-2-03: 072 and 073

Please review the Draft Supplemental Environmental Impact Statement
ONE (1) COPY OF THE SUBJECT DOCUMENT IS LOCATED IN ROOM 220

If this office does not receive your comments on or before the
suspense date, we will assume there are no comments.

() We have no comments. () Comments attached.
Signed: W. Payfady
Date: 5/30/00

THOMAS L. KING
DIRECTOR

02 JUN 7 12:52

TO: Mr. Dean Uchida, Administrator
Land Division

FROM: Linnell T. Nishioka, Deputy Director
Commission on Water Resource Management (CWRM)

SUBJECT: Waimanalo Gulch Sanitary Landfill EIS, TMK 9-2-03:072 and 073

FILE NO: WAIMANALOGULCH.COM

Thank you for the opportunity to review the subject document. Our comments related to water resources are marked below.

In general, the CWRM strongly promotes the efficient use of our water resources through conservation measures and use of alternative non-potable water resources whenever available, feasible, and there are no harmful effects to the ecosystem. Also, the CWRM encourages the protection of water recharge areas, which are important for the maintenance of streams and the replenishment of aquifers.

- () We recommend coordination with the county government to incorporate this project into the county's Water Use and Development Plan.
- () We recommend coordination with the Land Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
- (X) We are concerned about the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.
- () A Well Construction Permit and/or a Pump Installation Permit from the Commission would be required before ground water is developed as a source of supply for the project.
- () The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit from the Commission would be required prior to use of this source.
- () Groundwater withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
- () We are concerned about the potential for degradation of instream uses from development on highly erodible slopes adjacent to streams within or near the project. We recommend that approvals for this project be conditioned upon a review by the corresponding county's Building Department and the developer's acceptance of any resulting requirements related to erosion control.
- () If the proposed project includes construction of a stream diversion, the project may require a stream diversion works permit and amend the instream flow standard for the affected stream(s).
- () If the proposed project alters the bed and banks of a stream channel, the project may require a stream channel alteration permit.
- () OTHER:

If there are any questions, please contact Roy Hardy at 587-0274.

'00 JUN 13 PM 12 31



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
HONOLULU, HAWAII 96813
June 8, 2000

AGRICULTURE DEVELOPMENT
PROGRAMS
ADULTS AND SENIORS
COMMUNITY DEVELOPMENT
CONSUMER SERVICES
COURT SERVICES
FORESTRY AND WILDLIFE
LAND AND NATURAL RESOURCES
STATE PARKS
WATER RESOURCE MANAGEMENT

LD-NAV

Honorable Ronald K. Fujiki
Planning Director
City and County of Honolulu
Department of Planning and Permitting
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Fujiki:

SUBJECT: Draft Environmental Impact Statement for Waimanalo
Gulch Sanitary Land Fill Expansion

Thank you for the opportunity to review and comment on the subject matter.

We have transmitted the subject informational material to our appropriate divisions for their review and comment on the proposed project.

Attached herewith is a copy of our Division of Forestry and Wildlife's comments.

The Department has no other comment to offer on the subject matter at this time.

Should you have any questions, please feel free to contact Nicholas Vaccaro of the Land Division's Support Services Branch at 808-587-0438.

Very truly yours,

Dean Y. Uchida
DEAN Y. UCHIDA
Administrator

C: Oahu District Land Office
R. H. Towill Corporation

Ref.: WAIMANALOGULCH.RCH

Division of Forestry and Wildlife

1151 Punchbowl SL Room 325, Honolulu, Hawaii 96813
(808) 587-0166 Fax (808) 587-0160

Memo

To: Nick Vaccaro, Land Agent
Land Division

Through: Dean Uchida, Administrator
Land Division

From: Michael G. Buck, Administrator
DOFAW

Date: May 31, 2000

Subject: Waimanalo Gulch Sanitary Landfill

The expansion of the existing landfill at Waimanalo Gulch is understandable considering the amount of solid waste that is generated by human activity within the City & County of Honolulu. We note that the added space will meet the waste disposal projections through the year 2017 whereas the current 60.5 acres has accommodations only till 2002.

Since the proposal is within the 200 acre footprint for the Waimanalo Gulch Sanitary Landfill (WGSL), the environmental concerns expressed for the 1984 EIS remain the same, i.e. noise/fugitive dust/flooding, etc.

Particular emphasis is placed on the wildfire issue at this time because of the fire history associated with the location. The WGSL sits in the midst of a fire rich environment and measures to prevent fire starts and rapid spread must be treated with added precautions.

We urge that the applicant make a conscious and realistic appraisal of the risk-hazard-value of not only the immediate project area but also of its surroundings. Such an assessment can help detail a sound plan to prevent and rapidly suppress occurrence of wildfire. For example, possible ignition sources should be identified and appropriate measures detailed to prevent fire starts.

Nick Vaccaro
05/31/00
Page 2

Section 4.6.2-Fire Services, change this section to indicate that Station 40, Kapolei Fire Station provides coverage for the WGSL.

We also note that Section 4.6.4-Impacts and Mitigation Measures has provisions for fire protection but it does not detail a clearly defined plan for prevention, presuppression and suppression. For instance, the inclusion of firebreaks as part of the sanitary landfill operations is commendable but it should be designed and placed with consideration for its proximity to flammable fuels, steep topography, and wind speed/direction. The presence of a 6,000 gallon water truck coupled with workers on site can help provide initial attack but responding personnel must be properly trained to understand and avoid risks associated with wild land fire scenarios.

Once again, special attention must be given towards the fire potential for all activities associated with the WGSL. Its surroundings interface with residential and commercial centers so every precaution must be taken to prevent wildfires from impacting those locations either directly by threat of open flames or indirectly. For instance, the proposed expansion will underlie a major power transmission line from the Kahe Point Power Plant. Any smoke plumes that emerge from wildfires can trigger major power failure as was evidenced several years ago by agriculture burning activities.

Regarding the flora, we checked our references for the presence of T & E species and confirm the absence of any species of concern in the vicinity. As a double check, however, the State Botanist should be consulted also to assure that the location is free of a unique plant community. Our experiences at E. Kapolei, i.e. Abutilon menziesii, have given us reason for caution.

This memo serves as our response to your request for comment. Should you have any questions, please feel free to contact Pat Costales, Oahu Branch Manager, Division of Forestry and Wildlife at 973-9787.

Mahalo!

C: DOFAW, Oahu Branch

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

850 SOUTH KING STREET, HONOLULU, HAWAII 96813
PHONE: (808) 537-8853 • FAX: (808) 537-8875



JEREMY HARRIS
Liaison

TIMOTHY E. STEINBERGER, P.E.
ACTING DIRECTOR
IN REPLY REFER TO:
PE 01-079

May 14, 2001

Mr. Dean Y. Uchida, Administrator
Land Division
Department of Land and Natural Resources
State of Hawaii
P.O. Box 621
Honolulu, Hawaii 96809

Dear Mr. Uchida:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your letter dated June 27, 2000, concerning the subject Draft SEIS. We offer the following itemized response to your comments:

Engineering Branch Comments

The proposed site is not within the flood hazard area. We acknowledge the comments of the Engineering Branch that the proposed project will not affect current DLNR projects and programs.

Commission on Water Resource Management

The proposed project is intended to be developed in accordance with all necessary environmental permits and approvals, including the State Department of Health (DOH) Solid Waste Disposal Permit. All DOH requirements relating to protection of water quality, including Hawaii Administrative Rules, Section 11-54, Water Quality Standards, and Section 11-55, Water Pollution Control, will be followed.

Division of Forestry and Wildlife

1. We acknowledge your concern regarding fire control and will revise the forthcoming Revised Draft SEIS to note the following:
 - Fire coverage for the project site is provided by Station 40, Kapolei Fire Station, and

Mr. Dean Y. Uchida
May 14, 2001
Page 2

- Additional detail concerning fire control and suppression will be provided.

2. We acknowledge your comment that there are no threatened and endangered flora located at the project site. Per your request, we will consult with the State Botanist to again verify that the location does not serve as habitat for species such as *Abutilon menziesii*, which you have located in East Kapolei.

We appreciate your review of the Draft SEIS. Should you have any further comments, please contact Ms. Wilma Namunnart at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (extension 22).

Sincerely,

TIMOTHY E. STEINBERGER
Acting Director

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation

BOARD OF WATER &
CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HAWAII 96843



June 1, 2000

TO: MR. KENNETH E. SPRAGUE, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL SERVICES

ATTN: WILMA NAMUMNART

FROM: *Wilma Namumnart*
CLIFFORD S. JAMILE

SUBJECT: R.M. TOWILL CORPORATION'S TRANSMITTAL OF MAY 23, 2000
REGARDING THE DRAFT SUPPLEMENTAL ENVIRONMENTAL
IMPACT STATEMENT FOR THE PROPOSED WAIMANALO GULCH
LANDFILL EXPANSION. TMK: 9-2-03: 072 AND 73

DK	KTS
WES	NM
RIT	SE
JUN 13 2000 RMT	

Thank you for the opportunity to review and comment on the Draft Supplemental Environmental Impact Statement (SEIS) for the proposed Waimanalo Gulch Sanitary Landfill expansion project.

Our SEIS Preparation Notice comments of January 11, 2000 are still applicable and include in Chapter 11 of the document.

If you have any questions, please contact Scot Muraoka at 527-5221.

cc: Office of Environmental Quality Control
Randall Fujiki, Department of Planning and Permitting
Brian Takeda, R.M. Towill Corporation, Inc.

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

630 SOUTH BERETANIA STREET, HONOLULU, HAWAII 96813
Phone: (808) 527-4463 • Fax: (808) 527-4675



May 25, 2001

Mr. Clifford S. Jamile
Manager and Chief Engineer
Board of Water Supply
City and County of Honolulu
630 South Beretania Street
Honolulu, Hawaii 96843

Dear Mr. Jamile:

Subject: Draft Supplemental Environmental Impact Statement (SEIS) Preparation
Notice for the Expansion of the Waimanalo Gulch Sanitary Landfill

Thank you for your comments, dated June 1, 2000, regarding the subject Draft SEIS. We acknowledge your prior comment that waste disposal matters should be coordinated with the State Department of Health.

Should you have any further comments, please contact Ms. Wilma Namumnart of my staff at 527-5378.

Sincerely,

TIMOTHY E. STEINBERGER
Acting Director

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation

TIMOTHY E. STEINBERGER, P.E.
ACTING DIRECTOR
IN REPLY REFER TO
RE 011201

JEREMY HARRIS
MANAGER

JEREMY HARRIS, MANAGER
BOBBE FLORES, JR., CHIEF ENGINEER
CHARLES A. STEWART, VICE CHIEF ENGINEER
JAN M. L. Y. AM
KENNETH S. K. LAOPHA, SR.
BARBARA DEAN STANTON
KAZU HAYASHIDA, E-Office
ROSS S. SALAMURA, E-Office
CLIFFORD S. JAMILE
Manager and Chief Engineer



STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES

HISTORIC PRESERVATION DIVISION
650 S. King Street, Room 555
Honolulu, Hawaii 96813
Established in 1979

TIMOTHY E. STEINBERGER
ACTING DIRECTOR

REPLY REFER TO:
RE 01-077

SENIOR HISTORIC
PRESERVATION
MANAGER



May 30, 2000

Wilma Namunnart
Department of Environmental Services
City and County of Honolulu
650 S. King Street, 3rd Floor
Honolulu, Hawaii 96813

Dear Ms. Namunnart:

SUBJECT: Chapter 6E-8 Historic Preservation Review -- Draft Supplemental Environmental Impact Statement for the Waimanalo Gulch Sanitary Landfill Expansion, Waimanalo Gulch, O'ahu
Hoonululu, Ewa, O'ahu
TMK: 9-2-03-072-073

Thank you for the opportunity to review the Draft Supplemental EIS for the proposed expansion of the existing Waimanalo Gulch Sanitary Landfill. The City & County of Honolulu proposes a 60.5-acre expansion of the landfill site within the 200 acres of the existing landfill property.

The DSEIS incorporates the results of an archaeological inventory survey conducted for this project as well as our comments on the draft SEISPN (SHPD log 24720). We believe that the report has documented the lack of archaeological and/or historic sites in the proposed project area. Although the survey did locate two sites outside of the proposed expansion area, these sites have been recommended for preservation. Because no historic sites have been located within the proposed expansion area, and the two historic sites located outside the expansion boundary are to be preserved, we believe that the expansion project will have "no effect" on historic sites.

If you have any questions please call Sara Collins at 692-8026 or Elaine Jourdain at 692-8027.

Aloha,

Don Hibbard, Administrator
State Historic Preservation Division

Elsjk

cc: Brian Takeda, R. M. Towill Corp., 470 Waialeale Rd, Ste 411, Hon., Hawaii 96817-4941

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, HONOLULU HAWAII 96813
PHONE: 808-527-4663 • FAX: 808-527-4675

TIMOTHY E. STEINBERGER, P.E.
ACTING DIRECTOR

REPLY REFER TO:
RE 01-077

May 14, 2001

Mr. Don Hibbard, Administrator
State Historic Preservation Division
State Department of Land and Natural Resources
Kakuhinewa Building, Room 555
Kapolei, Hawaii 96707

Dear Mr. Hibbard:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your comments dated May 30, 2000, concerning the subject Draft SEIS. We acknowledge your concurrence that no historic sites have been located within the proposed expansion area and that the project will have "no effect" on historic sites.

We appreciate your review of the Draft SEIS. Should you have any further comments, please contact Ms. Wilma Namunnart at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (extension 22).

Sincerely,

TIMOTHY E. STEINBERGER
Acting Director

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R. M. Towill Corporation

HAY-15-00 MON 04:41 PM

PH REFUSE DIVISION

FAX NO: 808 527 5884

P.O.

BERNARD J. CRYSTIANO
GOVERNOR



RECEIVED

100 MAY -5 4 31 PM DEPARTMENT OF TRANSPORTATION
1405 PUNAHONA STREET
HONOLULU, HAWAII 96813-2900

Ref: 00-0664

MAY -3 2000

Post-it Fax Note	7671	Date	5/15/00	Page	1
To	Brian Tabeck	From	James Lewis		
Company	RWATC	On	Retiree Div		
Phone	842-1133	Phone	527 5832		
Fax	842-1137	Fax			

IN REPLY REFER TO:
HWY-PS
2.8255

Mr. Kenneth E. Sprague
Director
Department of Environmental Services
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Sprague:

Subject: Traffic Study, Draft Supplemental Environmental Impact Statement,
Preparation Notice, Expansion of Waimanalo Gulch Sanitary Landfill

Thank you for providing the requested traffic study for our review.

From our review, we confirmed that the expansion of the landfill will not significantly impact our State highway facilities. If there are any changes to the operation of the landfill that would significantly change the traffic situation, please coordinate with the Highways Division.

Very truly yours,

Kazu Hayashida

KAZU HAYASHIDA
Director of Transportation

Amend Section 639 - Temporary Project Water Pollution Control (Soil Erosion) to read as follows:

SECTION 209 - EROSION CONTROL

209.01 Description. This work includes constructing temporary erosion control measures according to the contract or as specified by the Engineer during the life of the project to prevent water pollution and clogging of drainage system. Erosion control measures include use of berms, dikes, dams, sediment basins, fiber mats, netting, gravel, mulches, grasses, and slope drains.

Apply temporary erosion and siltation control measures to erodible material of this project, including local material sources and work areas and haul roads. Temporary erosion control may include construction work outside the right-of-way where such work is necessary due to roadway construction such as borrow pit operations, haul roads and equipment storage sites.

209.02 Materials.

- (A) Erosion Control Mat. Erosion control mat shall be jute mat.
- (B) Mulches. Mulches may be bagasse, hay, straw, fiber mats, netting, wood cellulose, bark, wood chips, or other suitable material acceptable to the Engineer. Mulches shall be clean and free of noxious weeds and deleterious materials.
- (C) Grass. Grass shall be seashore paspalum.
- (D) Fertilizer and Soil Conditioners. Fertilizer and soil conditioners shall be a standard commercial grade acceptable to the Engineer. Fertilizer shall conform to Subsection 712.18(A) - Commercial Fertilizer.

209.03 Erosion Control Conference. Hold an erosion control conference with the Engineer before the start of the applicable construction to discuss the sequence of work, plans and proposals for accomplishment of erosion control.

Plan, design and submit to the Engineer, at least 10 days before the conference:

- (1) diagrams that show the installation of each erosion control feature in exact relation to the sequence of each construction operation, and
- (2) plans that show approximate locations and typical details of each erosion control feature and drainage patterns. When altering drainage patterns critically by the progress of the construction, submit a separate drawing for each phase.

NH-083-1(43)
209-1a

7/7/00

No work shall start until the erosion control plans are accepted by the Engineer.

Modify the accepted plans and schedules to correct conditions that develop during construction that were not foreseen during the design or preconstruction stage.

209.04 Construction Requirements. The Contractor shall be responsible for obtaining all necessary permits to work near and/or in the ocean. Coordinate the temporary erosion control provisions with the permanent erosion control features specified in the contract throughout the construction and post construction period.

The Engineer has the authority to:

- (1) limit the surface area of erodible earth material exposed by clearing and grubbing.
- (2) limit the surface area of erodible earth material exposed by excavation, borrow, and fill operations and
- (3) direct the Contractor to provide immediate erosion control measures to prevent contamination of adjacent streams or other watercourses, lakes, ponds, or other areas of water impoundment.

Limit the surface area of earth material exposed:

- (1) to do the next operation within a given area and
- (2) its capability and progress in keeping the finish grading, mulching, seeding, and other pollution control measures current according to the accepted plans and schedule.

Confine the grubbing of vegetative root mat and stumps, and the stripping of topsoil within the limits of excavation that the Contractor can continuously prosecute within 15 days.

Confine excavation, borrow and embankment construction to the minimum area necessary to ease its equipment and work force engaged in the earth moving work.

The surface area of earth material exposed shall not exceed 50,000 square feet. Hydromulch seed within three days the areas remaining bared or cleared for more than 15 days within three days at no cost to the State.

Shape the earthwork at the end of each work day to control and direct the runoff of rainwater. Construct earth berms along the top edges of embankments or

NH-083-1(43)
209-2a

7/7/00

critical areas within the project such as along the right-of-way or streams, water channels or bodies of water to intercept runoff water.

Provide temporary slope drains to carry runoff from cuts and embankments. The slope drains may be of flexible or rigid construction. Shorten or extend the slope drains as the cut or fill advances. Provide a portable flume at the entrance to the temporary slope drains. Provide controlled discharges for waters impounded, directed or controlled by project activities or erosion control measures.

Shape, install topsoil, and plant or finish the cut slopes according to the contract as the work progresses. Seed and mulch the cut slopes as the excavation continues. Exposed surfaces shall not be greater than 15 feet in height. If the Contractor or the Engineer suspends or halts major excavation and the slope is bare for more than 15 consecutive days, hydro-mulch seed the exposed surfaces at no cost to the State. As an alternative, the Contractor may spread a two inch layer of wood chips conforming to Subsection 712.45(A) - Wood Chips over the entire area and till the wood chips into the soil as soil amendment just before planting.

Finish the fill slopes according to the contract. Also, protect and preserve the finished and previously seeded areas from damages and spillover materials placed in the upper lifts of embankment.

Construction of berms, cofferdams or diversions in or near the streams, ponds, waterways or bodies of water shall be of accepted materials.

Use brush, limbs and root mat, except stumps cleared on the project, to construct silt barriers according to the contract or as specified by the Engineer. When rock excavation is available on the project, dump spread an 8 to 15 inch layer of such materials over the lower region of embankments in the immediate area of stream crossings. Use the rock to cover ditches, channels and other drainage ways leading away from cuts and fills. Prepare drainage ways to receive the rock excavation to avoid reducing their cross section. When rock excavation is not available on the project, use materials according to Subsection 208.02(B) - Mulches and as specified by the Engineer.

When requiring water pollution control measures due to the Contractor's convenience, negligence, carelessness, or failure to install permanent controls as a part of the work as scheduled, do such work at no cost to the State. Such work includes:

- (1) shaping the earthwork to control or to direct the runoff at the end of each work day,
- (2) constructing and maintaining earth berms, swales, temporary slope drains, and cofferdams or diversions in or near the area of streams, ponds,

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waterways or bodies of water or within the limits of the project and other erosion work according to the contract and,

(3) erosion control measures specified by the Engineer.

When failing repeatedly to control erosion, water pollution, and/or siltation, the Engineer reserves the right to:

- (1) employ outside assistance or
- (2) use the Engineer's own forces

to provide the necessary corrective measures. The Engineer will charge the Contractor such incurred direct costs plus project engineering costs. The Engineer will make appropriate deductions from the Contractor's monthly progress estimate.

The Contractor shall maintain the erosion control features.

When there are conflicts between these requirements and pollution control laws, rules, or regulations of other Federal or State or local agencies, the more restrictive laws, rules, or regulations shall apply.

Failure to conform with the above will be cause for suspension of the operations.

209.05 Method of Measurement. The Engineer will measure erosion control; installation and maintenance of site-specific NPDES best management practices required, and disposal of hazardous waste on a force account basis according to Subsection 109.04 - Extra and Force Account Work.

The Engineer will not measure erosion control work required that is due to the Contractor's convenience, negligence, carelessness, or failure to install permanent controls.

The Engineer will measure the work involved in dump spreading rock excavation material, when available on the jobsite, or other materials when rock excavation is not available on the project as described above on a force account basis according to Subsection 109.04 - Extra and Force Account Work.

209.06 Basis of Payment. The Engineer will pay for the accepted erosion control; installation and maintenance of site-specific NPDES best management practices required; and disposal of hazardous waste on a force account basis according to Subsection 109.04 - Extra and Force Account Work.

The Engineer will not authorize progress payment until the Engineer accepts the Site-Specific NPDES Best Management Practices plans as noted in the contract plans.

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The Engineer will deduct the amount from the progress payment for citations received by the Department for non-compliance of the NPDES Permit requirements.

The Engineer will not pay for erosion control work required that is due to the Contractor's convenience, negligence, carelessness or failure to install permanent controls.

The Engineer will not pay for dewatering and/or hydrotesting facilities separately. The cost for these facilities shall be considered incidental to the work that requires their use and shall be paid for by the Contractor.

The Engineer will not pay for topsoil, grassing, erosion control mat, and 90-day maintenance period. The cost for these items of work shall be considered incidental to the work that requires their use and shall be paid for by the Contractor.

The Engineer will pay for the work involved in dump spreading rock excavation material, when available on the jobsite, or other materials when rock excavation is not available on the project as described above on a force account basis according to Subsection 109.04 - Extra and Force Account Work.

The Engineer will make payment under:

Pay Item	Pay Unit
Erosion Control	Force Account*

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If the Contractor decides to revise its working method that requires grading, noise, and/or NPDES permits, the Contractor shall be responsible in getting the necessary permits and licenses.

Delays in meeting the requirements of the permits and licenses shall not be a cause for time extension or cost increase."

(V) Delete 107.11 Federal Aid Provisions in its entirety.

(VI) Amend 107.12 Sanitary, Health, And Safety Provisions to read as follows:

"107.12 Sanitary, Health, And Safety Provisions. The employees shall not work in conditions that are unsanitary, hazardous or dangerous to its health or safety. Provide and maintain sanitary, health and safety provisions for its employees according to the Department and local Boards of Health.

The Contractor is directed to the Federal, State, and County laws, rules, and regulations concerning construction safety and health standards."

(VII) Amend 107.13 Public Convenience and Safety to read as follows:

"107.13 Public Convenience and Safety. Provide for the safety and convenience of the public and the protection of people and property according to Subsection 104.04 - Maintenance of Traffic."

(VIII) Amend 107.15 Use of Explosives or Combustibles to read as follows:

"107.15 Use of Explosives. When the use of explosives or combustibles is necessary, do not endanger life or property including the new work. The Contractor shall be responsible for damages and injuries resulting from the use of explosives.

The storage and use of explosives shall be according to Section 396-B, HRS.

Notify each public utility company working near the work site in writing of its intentions to use explosives. Give 10 working days notice.

Use only electric detonators for blasting. Do not use common fuses."

(IX) Amend 107.17 Protection of Rivers, Streams, Impoundments, Forests and Archeological, Historical, and Burial Site Findings as follows:

Amend (B) Pollution by adding the following after the first paragraph:

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"The Contractor shall dispose of hazardous waste material according to local or State regulation or by the manufacturer and instruct the project personnel of these regulations. The Contractor shall be responsible for seeing that these regulations are followed."

(X) Amend 107.21 Contractor's Responsibility for Utility Property and Services as follows:

Amend (B)(5) to read as follows:

"(5) The Contractor shall obtain an excavation permit two weeks before starting construction for work greater than 12 inches in depth and/or the addition of new sign or guardrail posts. The Contractor shall obtain the permits from HECO's Mapping and Records Division located on the fourth floor at 820 Ward Avenue."

Amend (D) Notes for Wastewater Management (DWM) Facilities to read as follows:

"(D) Notes for Wastewater Management (DWM) Facilities.

(1) The Contractor shall perform all sewer construction according to the City's specifications, September 1986; the DWM's standard details, September 1984; current city practices and Revised Ordinances of Honolulu, 1990 as amended; and the Design Standards of the DWM, Volume 1, July 1993.

(2) The Contractor shall notify the Construction Section, DWM at 527-5620 or 523-4345 to arrange for inspection services and submit four sets of approved construction plans 7 days before commencement of sewer work.

(3) The Engineer will show on the plans the underground pipes, cables, or ductlines known to exist from the Engineer's research of records. The Contractor shall verify the location and depth of the facilities and exercise proper care in excavating the area. The Contractor shall be responsible and shall pay for all damaged utilities.

(4) The Contractor shall be responsible for maintaining continuous sewer service to all affected areas during construction.

(5) The Contractor shall be responsible for any sewage spills caused during construction. The Contractor shall notify the State Department of Health and utilize appropriate sampling and analyzing procedures. The Contractor shall be responsible for all public notification and press releases."

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Amend (E)(2) by revising the telephone number "547-3575" in the second sentence of the second paragraph to read "594-5575".

(XI) Add the following:

"107.25 Contaminated and/or Hazardous Material. The Contractor shall at all times conduct its operations according to all Federal and State permit requirements concerning the disposal of contaminated or hazardous materials. Permit requirements include those established by the federal regulations administered by the United States Coast Guard and the U.S. Army Corps of Engineers.

The Contractor shall require appropriate permits for all activities associated with or incidental to the Contractor's operations including those on the Project site and in all adjacent areas, waste and disposal areas, borrow and gravel banks, storage areas, haul roads, access roads, detours, field office areas, and any other temporary staging areas. The Contractor shall be responsible for, and hold the State harmless from, any penalties or fines which any authority may assess due to the Contractor's failure to comply with the terms of all applicable permit requirements.

The Contractor shall submit all applications and obtain all permits required for Contract work within the limits shown on the plans or identified elsewhere in the Contract documents.

The Contractor shall submit in writing any request for authorization of activities or methods not specifically called for by the Contract, plans, applications submitted or applicable permits issued for the project. Include a detailed description of the proposed activities and supporting documentation showing that the proposed activities or methods, the justification for those activities and supporting documentation showing that the proposed activity or method will not create risks of damage to the environment. If the Engineer accepts such proposal, the Contractor shall process an application to the appropriate regulatory agency or agencies for any permit for any permit amendment, modification, revision, or new permit required for the Contractor to carry out the additional activities or implement the changed methods on the project.

The Engineer will not grant any extension of time as a result of the Contractor's request to perform work not authorized as part of the established permit requirements. No such proposed additional activity shall commence nor shall the Contractor implement such changed method until the Engineer accepts the Contractor's request in writing.

The Contractor shall acquire any permits, identification numbers, and approvals required under the Resource Conservation and Recovery Act; Comprehensive Environment Response, Compensation, and Liability Act; or any

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other applicable Federal, State, or local environment law, for the management and disposal of all contaminated and/or hazardous material known to exist or discovered during construction operations, provided that:

- (1) such material is within the construction limits defined in the Contract, and;
- (2) such material is not comprised of waste materials generated by the Contractor.

If the Department has defined an area of known or suspected contamination within the project limits, and if contaminated material in that area has not been removed before the start of the project, the Contractor shall arrange for the disposition of such material with an appropriate party.

If the Contractor encounters or exposes any material, not previously known or suspected to be contaminated, but which exhibits abnormal properties which may indicate the presence of hazardous or contaminated material, the Contractor shall cease all operations in the vicinity of the abnormal condition, and notify the Engineer immediately. The presence of barrels, discolored earth, metal, wood, visible fumes or smoke, abnormal odors or excessively hot earth may indicate the presence of hazardous or contaminated material, and shall treat them with extreme caution. The Contractor shall arrange for the proper disposition of the material with an appropriate party.

When the Contractor performs support work incidental to the removal, treatment, or disposal of hazardous or contaminated material, the Engineer will make payment at the unit prices for applicable pay items in the Contract. When the Contract does not include appropriate pay items, the Engineer will make payment according to Subsection 104.03 - Extra Work.

The Contractor shall faithfully observe all security precautions established according to OSHA regulations including all revisions and amendments and shall not work in any area known to contain or suspected of containing hazardous or contaminated material without prior written acceptance of the Engineer.

The Contractor shall assume sole responsibility for the proper storage, handling, management, and disposal of all regulated materials and wastes associated with the Contractor's operations, including lubricants, antifreeze, engine fluids, paints, and solvents. All costs associated with the Contractor's failure to properly manage such materials according to Federal and State regulations, and all remedial and punitive costs incurred by the Department as a result of such failure will be charged to the Contractor. After properly disposing of such contaminated and/or hazardous material and after the State and/or utility company accepts such disposition in writing, the State and/or utility company will, thereafter, be responsible and liable for the contaminated and/or hazardous material.

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END OF SECTION

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SECTION 107 - LEGAL RELATIONS AND RESPONSIBILITY TO PUBLIC

Make the following amendments to said Section:

(I) Amend 107.01 Laws to be Observed by adding the following after the first paragraph:

"The Contractor shall expose the work to the inspection of the appropriate Federal agency. Such inspection shall not make the Federal Government a party to this contract."

(II) Amend 107.02 Wages and Hours Requirements as follows:

Amend the first paragraph to read as follows:

"107.02 Wages and Hours Requirements. The Contractor shall at all times observe and comply with all provisions of Chapter 104, HRS, which are emphasized in Attachment I entitled 'Requirements of Chapter 104, HRS Wages and Hours of Employees On Public Work Law', appended hereto and which require, in part, the following:"

Amend (A) Hours of Labor by revising the first paragraph to read as follows:

"(A) Hours of Labor. Workers shall receive compensation at a rate of not less than one and a half times the worker's basic hourly rate if the worker works:

- (1) over 8 hours in one day,
- (2) over 40 hours in one week; or
- (3) on Saturdays, Sundays or legal State holidays

plus the cost of fringe benefits according to wage rate schedules issued by the Director of Labor and Industrial Relations."

Amend (B) Rate of Wages to read as follows:

"(B) Rate of Wages. The Contractor shall pay:

- (1) no less than the prevailing wages, and
- (2) no less than the increases to the prevailing wages to the various classes of laborers and mechanics as published in the wage rate bulletins determined by the Director of the Department of Labor and Industrial Relations (DLIR) for the entire term of the contract. For Federal

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projects, such wage rate schedule shall be applicable if consistent with Federal law, statutes or regulations.

For bidding purposes, the wage rate schedule established by DLIR five calendar days before the date of bid opening shall be applicable. For Federal-Aid projects, such wage rate schedule shall be applicable if consistent with Federal law, statutes or regulations.

Said wage rate schedule may be obtained from the Contracts Office, Department of Transportation, 869 Punchbowl Street, Honolulu, Hawaii 96813. The Department will include the current State wage rate schedule physically in the contract documents executed by the successful bidder.

The United States Department of Labor and the DLIR have established minimum wage rate schedules for workers. The Contractor shall not pay the workers less than the wages set forth on the applicable schedules.

Flaggers who perform traffic safety duties and no actual construction work on contract subject to the Davis Bacon labor standard provisions shall be considered laborers or mechanics within the meaning of the Davis Bacon Act.

On all Federal-Aid projects, both wage rate schedules shall apply, and the higher rates shall prevail.

The Contractor shall post the schedule of prevailing rates of minimum wages applicable to the work in a prominent and easily accessible place at the project site. The Contractor shall give to each worker employed under the contract a copy of that rates of wages required to be posted at the time of employment.

The following applicable wage rate schedule or schedules shall be appended hereto:"

(III) Delete 107.04 Citizen Labor in its entirety.

(IV) Amend 107.08 Permits, Licenses, And Taxes by adding the following paragraph:

"The Contractor shall be responsible in meeting the requirements of the grading, noise, and National Pollutant Discharge Elimination System (NPDES) permits and licenses needed to do its work on a timely basis.

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DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, HONOLULU, HAWAII 96813
PHONE: 808-527-4422 FAX: 808-527-4878



TIMOTHY E. STEINBERGER, P.E.
ACTING DIRECTOR
#100110000100
RE: 01-078

May 16, 2001

Mr. Brian Minaabi, Director
State Department of Transportation
869 Punchbowl Street
Honolulu, Hawaii: 96813

Dear Mr. Minaabi:

Subject: Draft Supplemental Environmental Impact Statement (SEIS)
Waimanalo Gulch Sanitary Landfill Expansion

Thank you for your comments dated May 30, 2000, concerning the subject Draft SEIS. We acknowledge your comment that the proposed project will not significantly impact State Highway facilities.

We appreciate your review of the Draft SEIS. Should you have any further comments, please contact Ms. Wilma Namunihart at 527-5378 or Mr. Joseph Hernandez of Waste Management of Hawaii, Inc., at 668-2985 (extension 22).

Sincerely,

TIMOTHY E. STEINBERGER
Acting Director

cc: Mr. Joe Hernandez, Waste Management of Hawaii, Inc.
Mr. Brian Takeda, R.M. Towill Corporation

DEPARTMENT OF ENVIRONMENTAL SERVICES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, HONOLULU, HAWAII 96813
Phone: (808) 527-6600 • Fax: (808) 527-6878



JOEAK HAWES
LAWYER

TIMOTHY E. STEINBERGER, P.E.
ACTING DIRECTOR
IN REPLY REFER TO:
HE 81-078

May 16, 2001

Mr. Brian Minaai, Director
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869 Punchbowl Street
Honolulu, Hawaii 96813

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Mr. Brian Takeda, R.M. Towill Corporation